Columbia Business Center
Initial Study
Mitigated Negative Declaration

Prepared for:

City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522

Project Proponent:

Operating Engineers Pension Trust
C/O Washington Capital Management, Inc.
1301 Fifth Avenue, Suite 3100
Seattle, Washington 98101

Prepared by:

MIG|Hogle-Ireland, Inc.
1500 Iowa Avenue, Suite 110
Riverside, California 92507

March 2015

- This document is designed for double-sided printing -

Table of Contents

List of Tables

List of Figures

List of Exhibits

1 Introduction

The City of Riverside (Lead Agency) received applications for a General Plan Amendment, Specific Plan Amendment, Variance, Tentative Parcel Map, and Conditional Use Permit for three speculative warehouse buildings totaling 1,461,449 square feet at the southeast corner of Michigan Avenue and Palmyrita Avenue. The approval of these applications constitutes a project that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et. seq.).

This Initial Study has been prepared to assess the short-term, long-term, and cumulative environmental impacts that could result from the proposed warehouse development.

This report has been prepared to comply with Section 15063 of the State CEQA Guidelines, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.11);
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4.);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Sections 4.10); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

The body of state law known as *CEQA* was originally enacted in 1970 and has been amended a number of times since then. The legislative intent of these regulations is established in Section 21000 of the California Public Resources Code, as follows:

The Legislature finds and declares as follows:

a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the

quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the State to:

h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
j) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in Section 21002 of the Public Resources Code, quoted below:

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Tiering

This Initial Study *tiers* from the City's General Plan EIR. Section 15152 et seq of the CEQA Guidelines describes *tiering* as a streamlining tool as follows:

(a) *Tiering* refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.

(b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

(c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed, site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

(d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.

(e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.

(f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.

(1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.

(2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).

(3) Significant environmental effects have been *adequately addressed* if the lead agency determines that:

(A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or

(B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

(g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.

1.3 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts, identify the information that is purportedly lacking in the Initial Study or indicate where the information may be found. All comments on the Initial Study are to be submitted to:

Kyle Smith, AICP, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-826-5220

Following a 20-day period of circulation and review of the Initial Study, all comments will be considered by the City of Riverside prior to adoption.

1.4 – Availability of Materials

All materials related to the preparation of this Initial Study are available for public review. To request an appointment to review these materials, please contact:

Kyle Smith, AICP, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-526-5220

2 Project Description

2.1 – Project Title

Columbia Business Center

2.2 – Lead Agency Name and Address

City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522

2.3 – Contact Person and Phone Number

Kyle Smith, AICP, Senior Planner
951-826-5220
kjsmitih@riversideca.gov

2.4 – Project Location

Southeast corner of Palmyrita Avenue and Michigan Avenue
Riverside, California 92507
(See Exhibit 1, Regional Context and Vicinity Map)

2.5 – Project Sponsor's Name and Address

Columbia Business Center, LLC
C/O Invesco Real Estate
Three Galleria Tower, Suite 500
13155 Noel Road
Dallas, Texas 75240

2.6 – General Plan Land Use Designation

B/OP - Business/Office Park

2.7 – Zone

BMP-SP – Business and Manufacturing Park, and Specific Plan (Hunter Business Park) Overlay Zones

2.8 – Project Description

The project includes construction of three speculative warehouse buildings: Building A includes 985,620 SF warehouse and 15,000 SF office space, Building B includes 361,842 SF warehouse and 8,000 SF office space, and Building C includes 82,987 SF warehouse and 8,000 SF office (see Exhibit 2, Site Plan) on a 72.5-acre property located at the southeast corner of Palmyrita Avenue and Michigan Avenue (APNs 257-040-015, -018, 019, -020, -021, -022 and 257-050-021, -022, -

023). The buildings are intended to be used as warehouse/distribution facilities; however, end users have not been identified at this time, as such, specific details about the future operation of the facility are not currently available. The proposed design will be concrete tilt-up buildings. The project includes 585 standard and handicap parking spaces, 272 trailer spaces, and 221 dock doors. The project applications include a General Plan Amendment, Specific Plan Amendment, Variance, Tentative Parcel Map, and Conditional Use Permit.

The existing project site was historically used as citrus groves, but is currently vacant. There is evidence of soil removal along the northern boundary and in the southwestern corner that is related to the previously planned industrial storage project that was halted around 2007-2008.

The project will have access to Palmyrita Avenue via four 40-foot wide driveways located along the frontage. One driveway will provide access to Building A, two will provide access to Building B, and one will provide access to Building C. In addition, a 60-foot wide driveway located near the southwestern corner of the site will provide truck access to Building A from Michigan Avenue. Interior drive aisles have a minimum width of 30 feet to provide adequate emergency access as required by the Fire Department. Existing street improvements include street pavement, painted medians, curbs, gutters, sidewalks, and parkway landscape improvements. All existing street and parkway improvements are to remain in place. All required right-of-way dedication has been provided; therefore, additional right-of-way dedication is not required or proposed. An unpaved road extends east from the end of Columbia Avenue and curves north to intersect Palmyrita Avenue. This is a planned Columbia Avenue extension that was not completed. The easement for this road will be vacated with this project.

Project Phasing and Construction Scheduling

The three buildings will not be built concurrently, but consecutively. Construction of Building A is modeled herein with a start date of January 2015.

Grading and Drainage

The project site has been previously graded and will not require the import or export of soils. Currently, the northern half of the site drains northwest to an existing 30-inch to 42-inch storm drain in Palmyrita and the southern half of the project site flows southwest to an existing 66-inch storm drain in Columbia Avenue. The project will remove existing storm drains and catch basins in the planned Columbia Avenue extension that will be vacated. Proposed on-site drainage improvements for this project include the creation of two detention basins, which will outflow into the existing drainage system. One basin will be located centrally at the southern portion of the site, south of Building B and another will be at the northern boundary of the project site north of Building C (see Exhibit 2).

Landscaping and Lighting

The proposed landscape coverage for the site is 657,464 square feet, or 21 percent of the project site. The landscaping will be designed to significantly reduce the required water consumption of the site as compared to traditional landscape designs. The design includes a variety of trees and shrubs that are described in more detail in the Landscape Plan included in the project submittal. Landscaped areas are to be located around the perimeter of the site and along parking areas separating the three buildings and the proposed detention basins.

Utilities

The proposed project will connect to existing facilities within existing right-of-ways. Water service is provided by the City of Riverside Public Works Department via an existing 20-inch water main in Palmyrita Avenue and a 12-inch water main in Michigan Avenue. The proposed project will connect to existing sewer laterals that are currently stubbed to the site from the ten-inch main in Palmyrita Avenue. The proposed project will connect to existing storm drains in Columbia Avenue

and Palmyrita Avenue. Runoff from landscaped areas to the north and west of Building A will drain into existing catch basins in Palmyrita Avenue and Michigan Avenue. Natural gas will be provided by the Southern California Gas Company via a six-inch main in Palmyrita Avenue and a six-inch main in Michigan Avenue. The City of Riverside maintains a conduit system in both Palmyrita Avenue and Michigan Avenue that will provide electrical services. Utility undergrounding will be required.

2.9 – Surrounding Land Uses

Existing development surrounds the project site to the west, north, and east. The Box Springs Mountains and associated regional park land are located to the south of the project site. Table 1 (Surrounding Land Uses) lists the existing land use, General Plan Designations, and Zoning districts surrounding the project site.

Table 1
Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	B/OP - Business/Office Park	BMP-SP – Business and Manufacturing Park, and Specific Plan (Hunter Business Park) Overlay Zones	Vacant
North	B/OP - Business/Office Park	BMP-SP – Business and Manufacturing Park, and Specific Plan (Hunter Business Park) Overlay Zones	Warehouse
South*	Open Space – Conservation (OS-C)	Residential Agricultural (R-A-10)	Vacant
East	B/OP - Business/Office Park	BMP-SP – Business and Manufacturing Park, and Specific Plan (Hunter Business Park) Overlay Zones	Warehouse
West	B/OP - Business/Office Park	BMP-SP – Business and Manufacturing Park, and Specific Plan (Hunter Business Park) Overlay Zones	Warehouse
* Riverside County designation.			

2.10 – Environmental Setting

The project site is currently vacant and is located within a predominantly industrial area. The Box Springs Mountains are located south of the project site. Access to the site is provided via Palmyrita Avenue and Michigan Avenue. The site has been previously disturbed and graded.

2.11 – Required Approvals

The City of Riverside is the only land use authority for this project and this project will require the following City approvals:

- General Plan Amendment
- Specific Plan Amendment
- Street Vacation
- Tentative Parcel Map
- Design Review

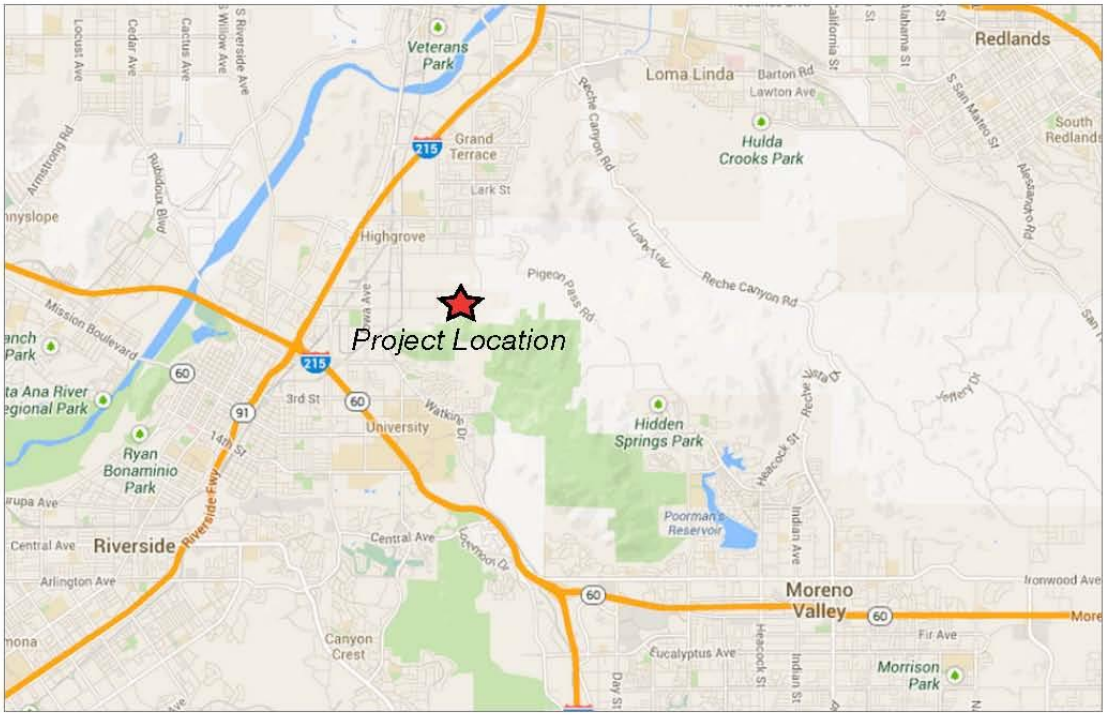
- Minor Conditional Use Permit
- Variance

2.12 – Other Public Agencies Whose Approval is Required

None

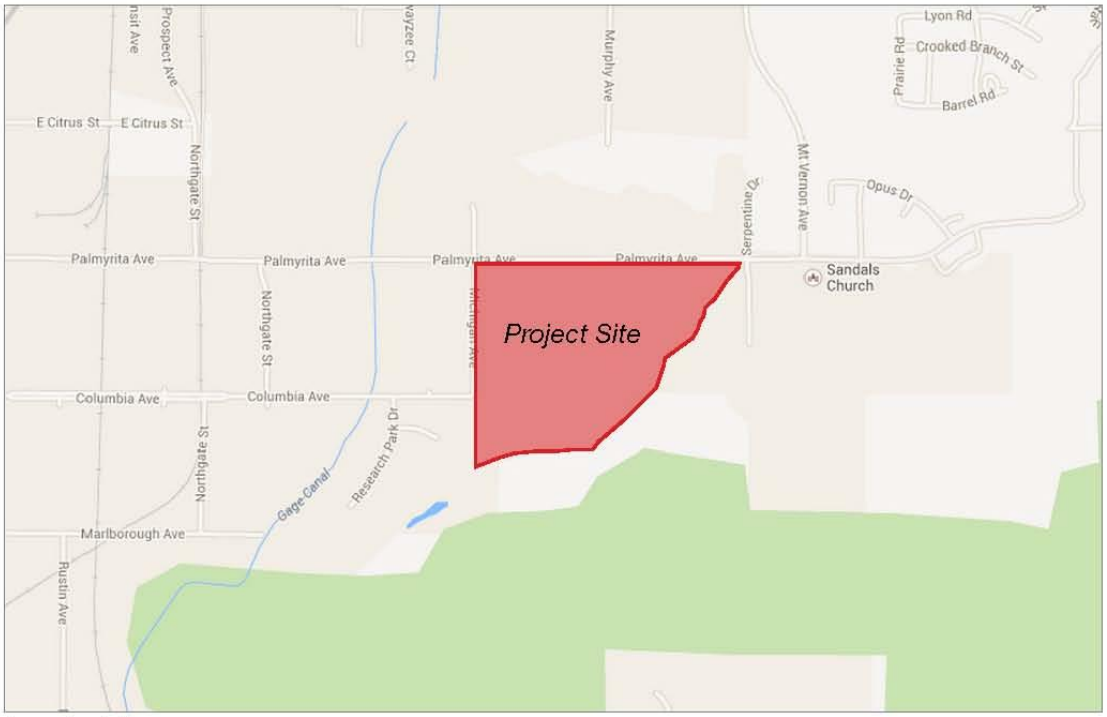
2.13 – Project Specific Technical Studies

- Air Quality/GHG Assessment
- Health Risk Assessment
- Biological Assessment
- Historical/Archaeological Resources Survey
- Geotechnical Investigation
- Geotechnical Infiltration Report
- Preliminary Environmental Site Assessment
- Water Quality Management Plan
- Traffic Impact Analysis



Source: Google Maps

Regional



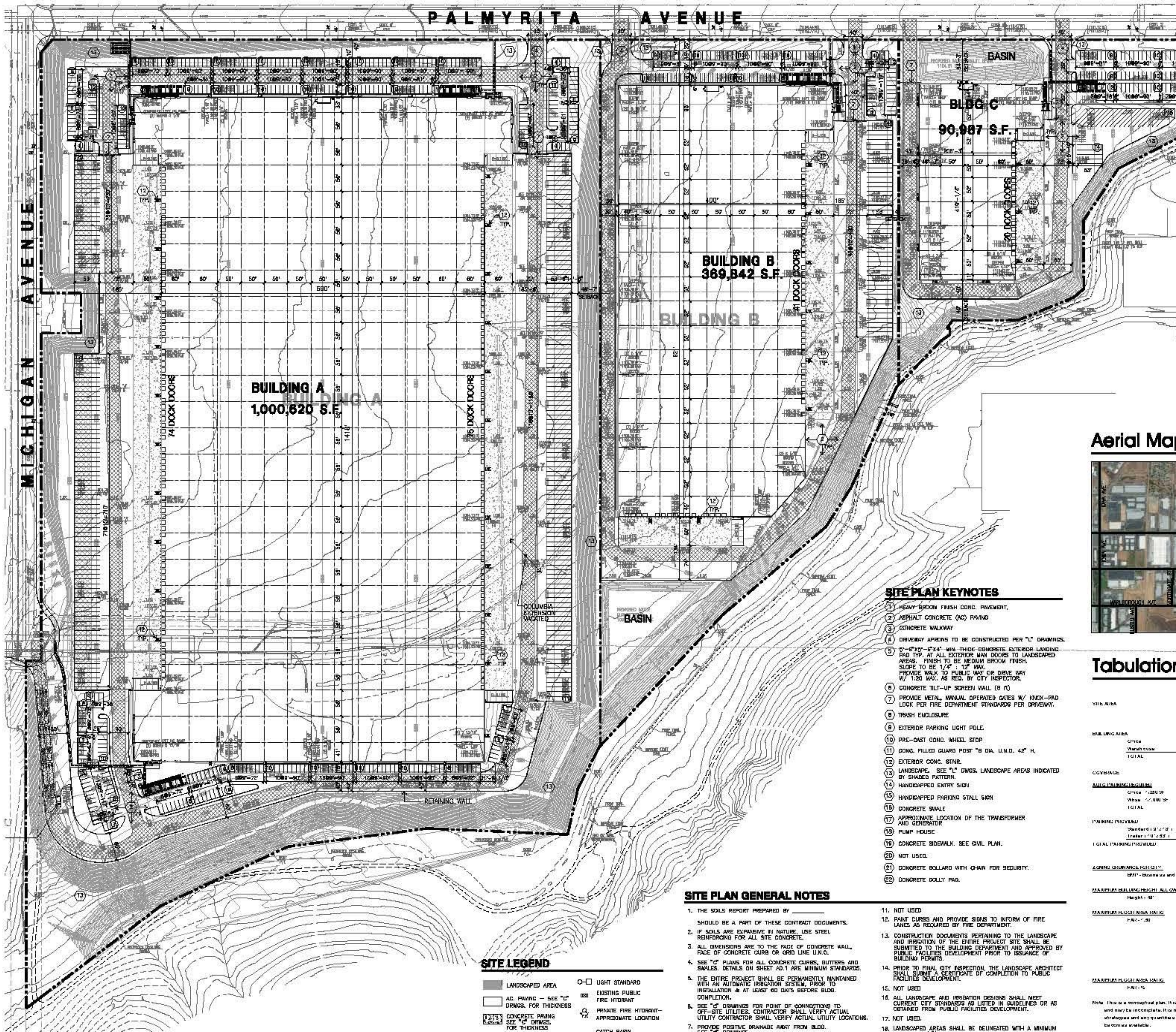
Source: Google Maps

Vicinity

Exhibit 1 Regional and Vicinity Map

Columbia Business Center, LLC C/O Invesco Real Estate

Riverside, California



SITE PLAN KEYNOTES

1. HEAVY BROOM FINISH CONC. PAVEMENT,
2. ASPHALT CONCRETE (AC) PAVING
3. CONCRETE WALKWAY
4. DRIVEWAY APRONS TO BE CONSTRUCTED PER "L" DRAWINGS.
5. 5'-6"X5'-6"X4" MIN. THICK CONCRETE EXTERIOR LANDING PAD TYP. AT ALL EXTERIOR MAN DOORS TO LANDSCAPED AREAS. FINISH TO BE MEDIUM BROOM FINISH. SLOPE TO BE 1/4" : 12" MAX. PROVIDE WALK TO PUBLIC WAY OR DRIVE WAY W/ 1:20 MAX. AS REQ. BY CITY INSPECTOR.
6. CONCRETE TILT-UP SCREEN WALL (8 ft)
7. PROVIDE METAL, MANUAL OPERATED GATES W/ KNOX-PAD LOCK PER FIRE DEPARTMENT STANDARDS PER DRIVEWAY.
8. TRASH ENCLOSURE
9. EXTERIOR PARKING LIGHT POLE.
10. PRE-CAST CONC. WHEEL STOP
11. CONC. FILLED GUARD POST "8 DIA. U.N.O. 42" H,
12. EXTERIOR CONC. STAIR.
13. LANDSCAPE. SEE "L" DWGS. LANDSCAPE AREAS INDICATED BY SHADED PATTERN.
14. HANDICAPPED ENTRY SIGN
15. HANDICAPPED PARKING STALL SIGN
16. CONCRETE SWALE
17. APPROXIMATE LOCATION OF THE TRANSFORMER AND GENERATOR
18. PUMP HOUSE
19. CONCRETE SIDEWALK. SEE CIVIL PLAN.
20. NOT USED.
21. CONCRETE BOLLARD WITH CHAIN FOR SECURITY.
22. CONCRETE DOLLY PAD.

SITE PLAN GENERAL NOTES

1. THE SOILS REPORT PREPARED BY ________ SHOULD BE A PART OF THESE CONTRACT DOCUMENTS.
2. IF SOILS ARE EXPANSIVE IN NATURE, USE STEEL REINFORCING FOR ALL SITE CONCRETE.
3. ALL DIMENSIONS ARE TO THE FACE OF CONCRETE WALL, FACE OF CONCRETE CURB OR GRID LINE U.N.O.
4. SEE "C" PLANS FOR ALL CONCRETE CURBS, GUTTERS AND SWALES. DETAILS ON SHEET AD.1 ARE MINIMUM STANDARDS.
5. THE ENTIRE PROJECT SHALL BE PERMANENTLY MAINTAINED WITH AN AUTOMATIC IRRIGATION SYSTEM, PRIOR TO INSTALLATION & AT LEAST 60 DAYS BEFORE BLDG. COMPLETION.
6. SEE "C" DRAWINGS FOR POINT OF CONNECTIONS TO OFF-SITE UTILITIES. CONTRACTOR SHALL VERIFY ACTUAL UTILITY CONTRACTOR SHALL VERIFY ACTUAL UTILITY LOCATIONS.
7. PROVIDE POSITIVE DRAINAGE AWAY FROM BLDG. SEE "C" DRAWINGS.
8. CONTRACTOR TO REFER TO "C" DRAWINGS FOR ALL HORIZONTAL CONTROL DIMENSIONS. SITE PLANS ARE FOR GUIDANCE AND STARTING LAYOUT POINTS.
9. SEE "C" DRAWINGS FOR FINISH GRADE ELEVATIONS.
10. CONCRETE SIDEWALKS TO BE A MINIMUM OF 4" THICK W/ TOOLED JOINTS AT 6' O.C. EXPANSION/CONSTRUCTION JOINTS SHALL BE A MAXIMUM 12' EA. WAY W/ 1:20 MAX. SLOPE. EXPANSION JOINTS TO HAVE COMPRESSIVE EXPANSION FILLER MATERIAL OF 1/4". SEE "L" DRAWINGS FOR FINISH.
11. NOT USED
12. PAINT CURBS AND PROVIDE SIGNS TO INFORM OF FIRE LANES AS REQUIRED BY FIRE DEPARTMENT.
13. CONSTRUCTION DOCUMENTS PERTAINING TO THE LANDSCAPE AND IRRIGATION OF THE ENTIRE PROJECT SITE SHALL BE SUBMITTED TO THE BUILDING DEPARTMENT AND APPROVED BY PUBLIC FACILITIES DEVELOPMENT PRIOR TO ISSUANCE OF BUILDING PERMITS.
14. PRIOR TO FINAL CITY INSPECTION, THE LANDSCAPE ARCHITECT SHALL SUBMIT A CERTIFICATE OF COMPLETION TO PUBLIC FACILITIES DEVELOPMENT.
15. NOT USED
16. ALL LANDSCAPE AND IRRIGATION DESIGNS SHALL MEET CURRENT CITY STANDARDS AS LISTED IN GUIDELINES OR AS OBTAINED FROM PUBLIC FACILITIES DEVELOPMENT.
17. NOT USED.
18. LANDSCAPED AREAS SHALL BE DELINEATED WITH A MINIMUM SIX INCHES (6") HIGH CURB
19. APPROVED CONCEPTUAL LANDSCAPE PLAN PRIOR TO GRADING PERMIT

SITE LEGEND

- LANDSCAPED AREA
- AC. PAVING – SEE "C" DRWGS. FOR THICKNESS
- CONCRETE PAVING SEE "C" DRWGS. FOR THICKNESS
- STANDARD PARKING STALL (9' X 19')
- HANDICAP PARKING STALL (9' X 19')
- GRASS COVERING SEE "L" DRWGS.
- LIGHT STANDARD
- EXISTING PUBLIC FIRE HYDRANT
- PRIVATE FIRE HYDRANT– APPROXIMATE LOCATION
- CATCH BASIN APPROX. LOCATION
- W — WATER LINE – SEE CIVIL
- G — GAS LINE – SEE CIVIL
- S — SEWER LATERAL SEE CIVIL

Source: HPA

Aerial Map

Tabulation

		Bldg 1	Bldg 2	Bldg 3	Total
SITE AREA		2,018,908	318,781	321,099	3,658,788
		46.35	13.30	7.37	72.50
BUILDING AREA	Office	15,000	8,000	8,000	29,000
	Warehouse	985,620	361,842	82,987	1,430,449
	TOTAL	1,000,620	369,842	90,987	1,461,449
COVERAGE		49.6%	45.2%	28.3%	38.3%
AUTO PARKING REQUIRED	Office (1/250 SF)	60	32	32	124
	Whse (1/1,000 SF)	988	262	83	1,431
	TOTAL	1048	294	115	1,455
PARKING PROVIDED	Standard (9' x 18')	377	107	93	583
	Trailer (10' x 53')	208	45	29	276
TOTAL PARKING PROVIDED		585	152	122	859

ZONING ORDINANCE FOR CITY

BMP - Business and Manufacturing Park Zone

MAXIMUM BUILDING HEIGHT ALLOWED

Height - 45'

MAXIMUM FLOOR AREA RATIO

FAR - 1.50

MAXIMUM FLOOR AREA RATIO

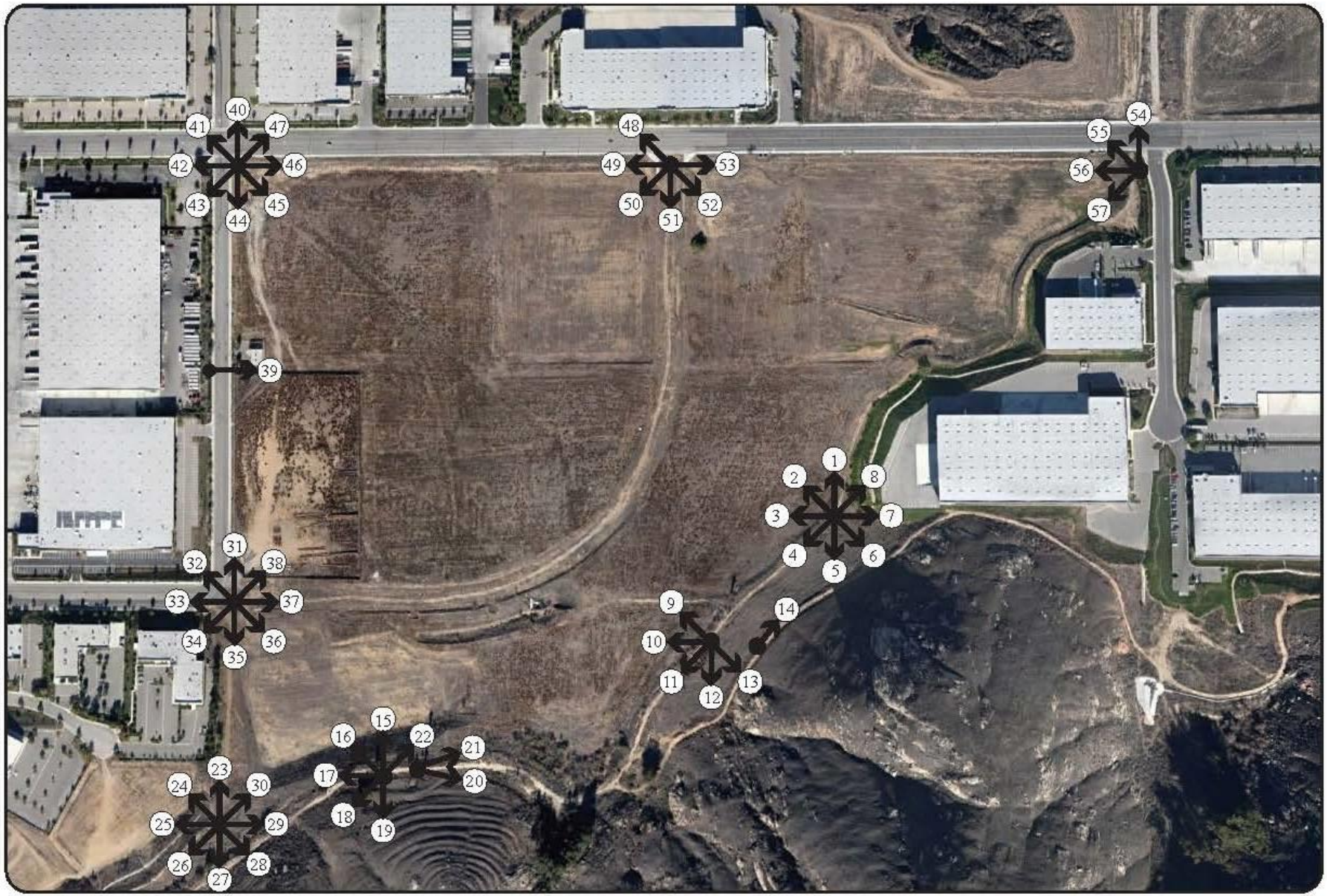
FAR - % 60%

Note: This is a conceptual plan. It is based on preliminary information which is not fully verified and may be incomplete. It is meant as a comparative aid in examining alternate development strategies and any quantities indicated are subject to revision as more reliable information becomes available.

Exhibit 2 Site Plan

Columbia Business Center, LLC C/O Invesco Real Estate

Riverside, California



Source: Google Earth 2013

Photos taken by MIG|Hogle-Ireland, August 2013

Not to Scale

Exhibit 3 Photo Location Map

MIG | Hogle-Ireland

Columbia Business Center, LLC C/O Invesco Real Estate
Riverside, California

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Exhibit 3a Photographic Survey

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Exhibit 3b Photographic Survey

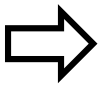

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Exhibit 3c Photographic Survey

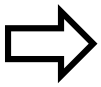

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Exhibit 3d Photographic Survey

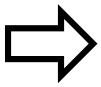

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Exhibit 3e Photographic Survey

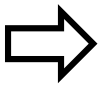

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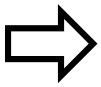
Exhibit 3f Photographic Survey



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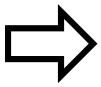

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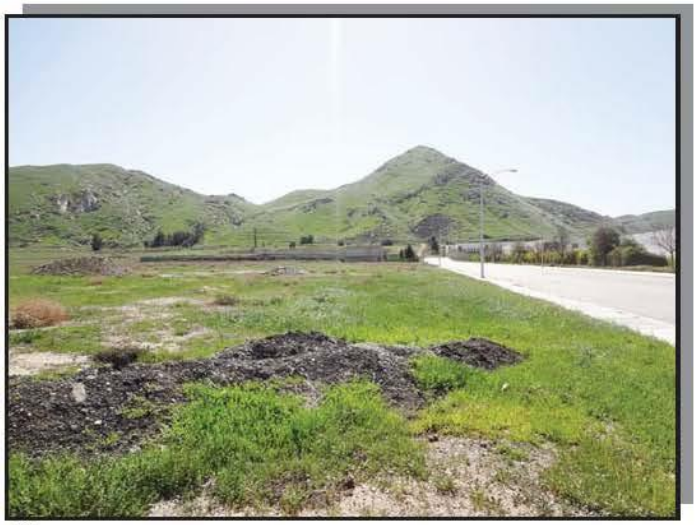

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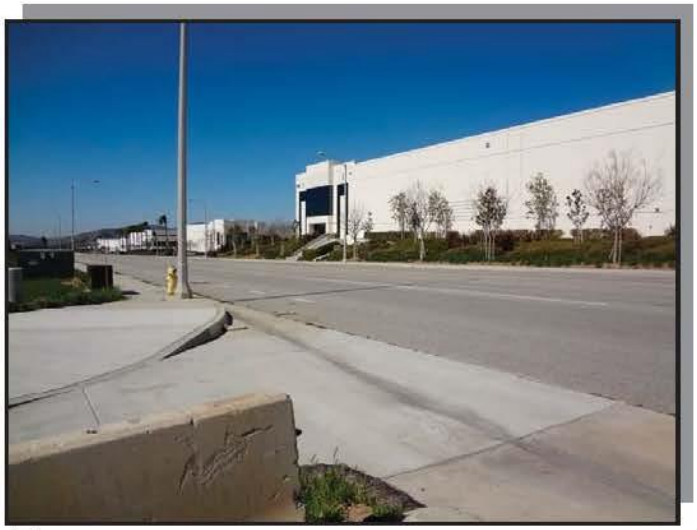

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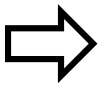

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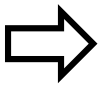
Exhibit 3i Photographic Survey



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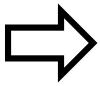


3 Determination

3.1 – Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a 'Potentially Significant Impact' as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Geology /Soils
☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials	☐	Hydrology / Water Quality
☐	Land Use / Planning	☐	Mineral Resources	☐	Noise
☐	Population / Housing	☐	Public Services	☐	Recreation
☐	Transportation/Traffic	☐	Utilities / Service Systems	☐	Mandatory Findings of Significance

3.2 – Determination

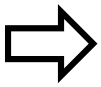
☐	The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☑	The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	The City of Riverside findsthat the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The City of Riverside finds that the proposed project MAY have a 'potentially significant impact' or 'potentially significant unless mitigated' impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

City of Riverside

Printed Name & Title



4.1 – Aesthetics

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☑	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	☐	☐	☑	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☑	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☑	☐	☐

a) **Less Than Significant Impact.** Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The project site is currently vacant and surrounded by industrial uses to the north, west, and east. The Box Springs Mountains are located to the south of the project site. No state scenic highways are located within or adjacent to the City limits, according to the State of California Department of Transportation (Caltrans) *California Scenic Highway Mapping System* Web Site.[1] Palmyrita Avenue is designated as a Special Boulevard by the City of Riverside that meets local criteria for designation as a scenic route, but is not a State Designated or Eligible Scenic Highway. Views of the Box Springs Mountain from Palmyrita Avenue may be blocked as the southern boundary of the project site is adjacent to the Box Springs Mountain Regional Park boundaries. However, the project is proposed within an area designated for industrial uses and the surrounding land along Palmyrita Avenue is developed with similar industrial uses. Riverside Municipal Code Chapter 19.130 requires that all development in the Business Manufacturing Park (BMP) zone have a maximum building height of 45 feet with no special restrictions for development along Special Boulevards. An eleven-foot variance has been requested to allow Building A to reach a height of 56 feet at its highest point. The proposed Building A will have a maximum height of 56 feet, Building B will have a maximum height of 44 feet, and Building C will have a maximum height of 42 feet.

[1] California Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/scenic_highways/ [July 2013]

b) **Less Than Significant Impact.** The project is not adjacent to a designated state scenic highway as identified on the California Scenic Highway Mapping System.[2] The project site is currently vacant and contains no scenic resources. The proposed project includes the construction of three warehouse buildings that are consistent in type and scale with the existing and planned development in the vicinity. The Box Springs Mountains are located immediately south of the project site. Palmyrita Avenue is currently fully developed with industrial use with the exception of the proposed project site. Buildings B and C will be in compliance with height limits as required by the Riverside Municipal Code, and a variance has been requested for Building A, which has a proposed height of 56 feet . The project will result in less than significant impacts.

c) **Less Than Significant Impact.** Degradation of visual character or quality is defined by substantial changes to the existing site appearance through construction of structures such that they are poorly designed or conflict with the site's existing surroundings.

Construction of the proposed buildings on the existing vacant site would alter the existing visual character of the site. However, the project site is located in an area designated for industrial use. Palmyrita Avenue is developed with similar uses with industrial/warehouse buildings to the west, north, and east of the project site. The project will comply with all pertinent design requirements of the Zoning Code, specifically those related to industrial warehouse land uses, to assure quality site design and building architecture that is well constructed and is consistent with the character of the area. The City of Riverside General Plan EIR states that Citywide design guidelines prevent the use of highly reflective surfaces and metal siding. The buildings will be of concrete tilt up panel style construction with architecturally enhanced main entrance and blue window glazing. Perimeter and interior landscaping is also proposed. With design features included, the project will have less than significant impacts on the visual character of the site and the surroundings.

d) **Less Than Significant Impact with Mitigation Incorporation.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

Development of the proposed project will require installation of outdoor lighting necessary for public safety and maintenance, as well as to accommodate nighttime business operations. All lighting will comply with the development standards contained in the City's Zoning Code. Municipal Code Chapter 19.590 (Performance Standards) requires that on-site lighting be arranged as to reflect away from adjoining property or any public streets. Light shall not be directed skyward or in a manner that interferes with aircraft operation.

The proposed project could involve nighttime industrial activities that would result in additional sources of light in the night. However, the project site is surrounded by industrial uses to the north, west, and east and there is currently substantial nighttime lighting in the surrounding areas of the project site due to the surrounding developments. Addition of new sources of permanent light and glare as a result of implementation of the proposed project would not significantly increase ambient lighting in the project vicinity. Moreover, due to the built nature of the project area, there is a significant existing amount of ambient light both in the project area and in the immediately surrounding vicinity.

[2] California Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/scenic_highways/ [July 2013]

An exact tenant-mix for the proposed project is not known at this time and a complete assessment of site-specific lighting and glare impacts of proposed development under the proposed project is not possible. The following mitigation measures include provisions to ensure that lighting spillover would be minimized and glare impacts from reflective surfaces would be reduced or eliminated to the extent feasible. The Box Springs Mountain Regional Park is to the south and new sources of light and glare could impact nocturnal wildlife. This mitigation measure and City Municipal Code Chapter 19.590 (Performance Standards) would ensure that even with the most intensive land uses for the proposed project, the impacts would be less than significant.

Mitigation Measure AVQ-1
Prior to issuance of building permits, project site plans shall incorporate the use of low sodium fixtures or similar building lights to minimize glare.

4.2 – Agriculture and Forest Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☑	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☑
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104 (g))?	☐	☐	☐	☑
d) Result in loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☑
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☑

a) **Less Than Significant Impact.** As indicated in the California Department of Conservation Division of Land Resource Protection and the City of Riverside General Plan EIR, the project site is identified as being farmland of local importance.[3][4] The project site was historically used as citrus groves, but is no longer in cultivation today. There is evidence of soil removal as part of a previous planned industrial storage project that was halted around 2007-2008. The project site is no longer used as farmland and is surrounded to the west, north, and east by industrial development. In addition, the project site is not designated or zoned for agricultural use

[3] California Department of Conservation. Division of Land Resource Protection. Farmland Mapping and Monitoring Program. [July 2013]

[4] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

according to the General Plan and Zoning Map. Therefore, the proposed project will not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Impacts will be less than significant.

b) **No Impact.** As indicated by the 2007 Riverside General Plan EIR, the project site was identified as being on Williamson Act enrolled land.[5] However, since preparation of the Riverside General Plan EIR, the status of the Williamson Act has changed. According to the Department of Conservation Division of Land Resource Protection, the project site is not located on Williamson Act enrolled land.[6] In addition the project is currently zoned as Business Manufacturing Park and is within the Hunter Business Park Specific Plan Industrial Park District which designates the site for industrial use. Therefore, there will be no conflict with existing zoning for agricultural use or a Williamson Act contract and impacts will be no impacts.

c) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site has been cleared of all vegetation and is zoned for industrial uses, with no vegetation onsite. Therefore, development of this project will have no impact to any timberland zoning.

d) **No Impact.** The project site is vacant and cleared with no substantial vegetation; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of this project.

e) **No Impact.** The project site is currently vacant and cleared with no substantial vegetation. The project is surrounded by other developed industrial properties to the west, north, and east with little to no trees. None of the surrounding sites contain existing forest uses. Development of this project will not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use.

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5 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

6 California Department of Conservation. Division of Land Resource Protection. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/ [February 2014]

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☑	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☑	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☑	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☑	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☑

a) **Less Than Significant Impact.** A significant impact could occur if the proposed project conflicts with or obstructs implementation of the South Coast Air Basin 2012 Air Quality Management Plan (AQMP). Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintaining existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, consistency with the South Coast Air Basin 2012 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP.[7] A consistency review is presented below:

[7] South Coast Air Quality Management District. CEQA Air Quality Handbook. 1993

1. The project would result in short-term construction and long-term pollutant emissions that are less than the CEQA significance emissions thresholds established by the SCAQMD, with mitigation incorporated, as demonstrated in Section 6.3 et seq of this report; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.

2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and *significant projects. Significant projects* include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and off-shore drilling facilities; therefore, the proposed project is not defined as *significant.* This project includes a General Plan and Specific Plan Amendment to vacate the Columbia Avenue Loop. Elimination of the Columbia Avenue Loop affects the Mobility Element alone. The Land Use Element and any assumptions used to estimate employee generation for the RTP will not be affected. Therefore consistency analysis with the AQMP will not be required.

Based on the consistency analysis presented above, the proposed project will not conflict with the AQMP.

b) **Less Than Significant Impact With Mitigation Incorporated.** A project may have a significant impact if project related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to existing or project air quality violations. The proposed project is located within the South Coast Air Basin, where efforts to attain state and federal air quality standards are governed by the SCAQMD. Both the State of California (State) and the Federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as 'criteria pollutants'). These pollutants include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), inhalable particulate matter with a diameter of 10 microns or less (PM_{10}), fine particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. Where the state and federal standards differ, California AAQS are more stringent than the national AAQS.

Air pollution levels are measured at monitoring stations located throughout the air basin. Areas that are in nonattainment with respect to federal or state AAQS are required to prepare plans and implement measures that will bring the region into attainment. Table 2 (South Coast Air Basin Attainment Status) summarizes the attainment status in the Basin for the criteria pollutants. Discussion of potential impacts related to short-term construction impacts and long-term area source and operational impacts are presented below.

Table 2
South Coast Air Basin Attainment Status

Pollutant	Federal	State
O_3 (1-hr)	--	Nonattainment
O_3 (8-hr)	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Nonattainment
SO_2	Attainment	Attainment
Pb	Nonattainment	Nonattainment
VRP	--	Unclassified
SO_4	--	Attainment
H_2S	--	Unclassified
Sources: ARB 2013		

Construction Emissions

The California Emissions Estimator Model (CalEEMod) version 2013.2.2 was utilized to estimate emissions from the proposed construction activities (see Appendix A, Air Quality/GHG Assessment).[8] Considering the site is relatively flat, no import or export of soil is anticipated. The three buildings will not be built concurrently, but consecutively. Construction of Building A was modeled with a beginning construction date of January 2015. Default CalEEMod construction phases were utilized. If construction should start at a later date, emissions will be slightly reduced due to higher efficiency in construction equipment.

Based on the results of the model, maximum daily emissions from the construction of all three buildings will result in excessive emissions of volatile organic chemicals (identified as reactive organic gases) associated with interior and exterior coating activities. Using the default assumption of 250 grams per liter (g/l) VOC content for interior and exterior coatings, daily VOC emissions would reach 623.95 lbs/day during summer and winter months in 2018 for Building A, 570.6 lbs/day during summer and winter months in 2020 for Building B, and 223.5 lbs/day for summer and winter months in 2021 for Building C.

To compensate for excessive VOC emissions from coating activities for Building A, the model includes use of a maximum zero g/l VOC content for interior coatings and 100 g/l VOC content for exterior surfaces. Use of low-VOC coatings during construction activities will reduce VOC emissions to 63.2 lbs/day during summer and winter months, less than the threshold established by SCAQMD. The use of a maximum of zero g/l VOC content for interior coatings and 125 g/l VOC content for exterior surfaces for Building B will reduce VOC emissions to 71.7 g/l during summer and winter months, less than the SCAQMD threshold. The use of a maximum of 50 g/l VOC content for interior coatings and 150 g/l VOC content for exterior surfaces for Building C will reduce VOC emissions to 67.3 g/l during summer and winter months, less than the SCAQMD threshold. The requirement for use of low-VOC coatings has been included as Mitigation Measure AQ-1 in Section 8 of this report. The results of the CalEEMod outputs with mitigation incorporated are summarized in Table 3 (Building A Maximum Daily Construction Emissions), Table 4 (Building

[8] MIG|Hogle-Ireland, Inc. Columbia Business Center Air Quality and Climate Change Assessment. November 2013.

B Maximum Daily Construction Emissions), and Table 5 (Building C Maximum Daily Construction Emissions).

Table 3
Building A Maximum Daily Construction Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer	63.22	79.16	115.37	0.22	21.36	12.83
Winter	63.23	79.17	117.49	0.21	21.36	12.83
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Substantial?	No	No	No	No	No	No

Table 4
Building B Maximum Daily Construction Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer	71.71	59.62	47.86	0.11	20.63	12.16
Winter	71.71	59.63	48.93	0.10	20.63	12.16
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Substantial?	No	No	No	No	No	No

Table 5
Building C Maximum Daily Construction Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer	67.27	38.93	33.75	0.06	20.20	11.76
Winter	67.27	38.94	33.68	0.06	20.20	11.76
Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Substantial?	No	No	No	No	No	No

Mitigation Measure AQ-1
Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Community Development Director, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the requirements of the CRP. The CRP measures shall be implemented to the satisfaction of the Building and Safety Division. These shall include the following:

Building A
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 100 g/l for exterior applications.

Building B
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 125 g/l for exterior applications.

Building C
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 50 g/l for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 150 g/l for exterior applications.

This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the SCAQMD. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.

The following lists existing regulatory requirements and standards that are required to be implemented as part of the proposed project. While the following measures are not considered mitigation pursuant to the CEQA, the Lead Agency may choose to include the following as conditions of approval to ensure that they are appropriately implemented.

S1 To reduce diesel emissions associated with construction, construction contractors shall provide temporary electricity to eliminate the need for diesel powered generators, or provide evidence that electrical hook ups at construction sites are not cost effective or feasible.

S2 To reduce construction related particulate matter air quality impacts of City projects, the following measures shall be required:

- The generation of dust shall be controlled as required by the AQMD;
- Grading activities shall cease during period of high winds (greater than 25 mph);
- Trucks hauling soil, dirt or other emissive materials shall have their loads covered with a tarp or other protective cover as determined by the City Engineer; and
- The contractor shall prepare and maintain a traffic control plan, prepared, stamped and signed by either a licensed Traffic Engineer or a Civil Engineer. The preparation of the plan shall be in accordance with Chapter 5 of the latest edition of the Caltrans Traffic Manual and the State Standard Specifications. The plan shall be submitted for approval, by the engineer, at the preconstruction meeting. Work shall not commence without an approved traffic control plan.

Operational Emissions

Long-term criteria air pollutant emissions will result from the operation of the proposed business park. Long-term emissions are categorized as area source emissions, energy demand emissions, and operational emissions. Operational emissions will result from automobile, truck, and other vehicle sources associated with daily trips to and from the warehouse. The California Emissions Estimator Model (CalEEMod) was utilized to estimate mobile source emissions. Buildings A and B were modeled as *unrefrigerated warehouses without rail spurs*. The smaller Building C was input as *Industrial Park* but the program values were adjusted to reflect the proposed warehouse use. Building C was input as a different use to account for the differences in trip generation.

Trip generation and fleet mix (1.68 daily trips per 1,000 SF for high-cube warehouse Buildings A and B and 3.56 daily trips per 1,000 square feet for warehouse Building C) are based on trip generation rates and fleet mix used in the Traffic Study prepared by Kunzman Associates. The heavy duty fleet mix is comprised of approximately 12.3 percent heavy-heavy-duty (HHD), 4.6 percent medium-heavy-duty (MHD), and 3.5 percent light-heavy-duty (LHD1). The remaining 79.6 percent of the fleet mix is allocated to passenger vehicles (LDA). It should be noted that emissions modeled in CalEEMod do not account for the five-minute idling restrictions required by State law. Idling emissions factors were reduced to account for these regulations. Trip lengths have been adjusted based on a study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program. According to observed data collected in the field for the Southern California Association of Governments (SCAG) region, trip lengths for warehouse uses are estimated at 5.92 miles for light-duty trucks, 13.06 for medium-duty trucks, and 22.40 for heavy-duty trucks. Total vehicle miles were calculated using the average daily trips

for each vehicle class and divided by total daily truck trips to get to an average truck distance of 17.41 miles. Assuming an opening year of 2020 with the building occupied and operational, the total results of the CalEEMod model for summer and winter conditions are summarized in Table 6 (Long-Term Unmitigated Daily Emissions).

Area source emissions are the combination of many small emissions sources that include use of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, and periodic repainting of the proposed buildings. Energy demand emissions result from use of electricity and natural gas. Emissions from area and energy sources were estimated using CalEEMod defaults, except for consumer product emissions. Due to an error in CalEEMod that calculates emissions from non-building square-footages (such as the project landscaping), the ROG emissions factor for consumer products was adjusted to 0.0000116 pounds per square foot per day to account for the error. Area and energy source emissions are included in Table 6. Based on the results of the model, maximum daily operational emissions associated with the proposed project will exceed the thresholds established by SCAQMD for NO_X.

Table 6
Long-Term Unmitigated Daily Emissions (lbs/day)

Source	ROG	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer						
Area Sources	50.40	0.003	0.32	0.00	0.001	0.001
Energy Demand	0.09	0.84	0.71	0.005	0.06	0.06
Mobile Sources	8.58	58.10	124.29	0.52	33.41	9.79
Summer Total	*59.07*	*58.94*	*125.32*	*0.53*	*33.47*	*9.86*
Winter						
Area Sources	50.40	0.003	0.32	0.00	0.001	0.001
Energy Demand	0.09	0.84	0.71	0.005	0.06	0.06
Mobile Sources	8.83	60.37	128.32	0.50	33.41	9.80
Winter Total	*59.31*	*61.21*	*129.35*	*0.51*	*33.48*	*9.86*
Threshold	55	55	550	150	150	55
Substantial?	No	**Yes**	No	No	No	No

In order to meet the SCAQMD daily threshold, NO_X emissions must be reduced by a minimum of 11.3 percent. It should be noted that individual operation of each building will not in and of itself cause the threshold to be exceeded, thus the required reduction applies to operation of all three buildings as a whole. To mitigate operational emissions of NO_X, pursuant to the on-road engines mitigation guidance provided by SCAQMD, NO_X emissions were analyzed with application of a NO_X filter.[9] Emissions reduction technology has the capability to remove a minimum of 25 percent NO_X emissions from on-road diesel vehicles and would thus reduce NO_X emissions to below the SCAQMD threshold.[10] Other strategies for reducing NO_X emissions include the use of trucks with engine years of 1990 or newer, limiting the number of trucks operating on a daily basis, or demonstrating that truck trip length is less than that used in CalEEMod (17.41 miles). With emissions reduction technology in effect or similar emissions reduction strategies, NO_X emissions will not exceed the daily threshold established by SCAQMD. The requirement for incorporation of filter technology or implementation of other strategies is incorporated as Mitigation Measure AQ-2.

Mitigation Measure AQ-2

[9] South Coast Air Quality Management District. Mitigation Measures and Control Efficiencies, On-Road Engines. Table IV – Mitigation Measures, Level 1,2, and 3 Retrofits for On-Road Engines. http://www.aqmd.gov/cega/handbook/mitigation/onroad/MM_onroad.html [December 2013]

[10] California Air Resources Board. Executive Order DE-08-007. December 2008

Prior to issuance of occupancy permits or business licenses, future tenants of the proposed project shall submit a report to the Community Development Director identifying all diesel engine powered trucks within the occupant's fleet and verification that oxides of nitrogen emissions will be reduced by a minimum of 11.3 percent below typical operating conditions. Emissions may be reduced through installation of oxide of nitrogen filters as verified by the California Air Resources Board through executive order, limiting of truck engine years to 1990 or newer, limiting operational truck trips and/or trip length, or any combination of methods that will otherwise not cause the South Coast Air Quality Management District (SCAQMD) daily threshold for oxides of nitrogen to be exceeded. This report shall be updated upon occupancy by a new tenant.

c) **Less Than Significant Impact.** Cumulative short-term, construction-related emissions from the project will not contribute considerably to any potential cumulative air quality impact because short-term project emissions will be less than significant and other concurrent construction projects in the region will be required to implement standard air quality regulations and mitigation pursuant to State CEQA requirements, just as this project has. Short-term construction-related cumulative impacts would thus be less than significant.

The SCAQMD CEQA Air Quality Handbook identifies methodologies for analyzing long-term cumulative air quality impacts for criteria pollutants for which the Basin is nonattainment. These methodologies identify three performance standards that can be used to determine if long-term emissions will result in cumulative impacts. Essentially, these methodologies assess growth associated with a land use project and are evaluated for consistency with regional projections. These methodologies are outdated, and are no longer recommended by SCAQMD.

As discussed above, the proposed project is consistent with current land use designations and is consistent with the growth assumptions in the AQMP. Therefore, the proposed project will not contribute to any potential cumulative air quality impacts.

d) **Less Than Significant Impact.** Sensitive receptors are those segments of the population that are most susceptible to poor air quality such as children, the elderly, the sick, and athletes who perform outdoors. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. There are no sensitive receptors in proximity to the project site.

SCAQMD has established thresholds for emissions of toxic air contaminants. Toxic air emissions from a project are considered potentially significant if maximum incremental cancer risk is greater than 10 persons in 1,000,000 (1E-05). Cancer risk is determined by calculating the annual average toxic concentration ($\mu g/m^3$) and multiplying it by the unit risk factor (URF) for the toxic and the lifetime exposure adjustment (LEA) of the receptor. URF represents the estimated probability that a person will contract cancer as a result of inhalation of a toxic of 1 $\mu g/m^3$ continuously over 70 years. Because some receptors are exposed to toxics for less than 70 years (i.e. off-site workers), the LEA adjusts the receptors exposure to represent actual exposure time. The LEA for residential uses and other sensitive receptors is 1, representing an assumed exposure of 70 continuous years. When a facility and its equipment operate continuously (i.e., 24 hrs/day and 365 days/yr), the LEA for an off-site worker is 0.14. For all other facility operating schedules, the LEA for an off-site worker is 0.66. In this report, industrial uses are assumed to operate continuously and commercial uses are assumed to operate during regular business hours (i.e. 8:00AM to 5:00PM). Cancer risk is estimated using the following equation:

$$CR_{DPM} = C_{DPM} * URF_{DPM} * LEA$$

where,

CR_{DPM} Cancer risk from diesel particulate matter; the probability of an individual developing cancer as a result of exposure to DPM

C_{DPM} Annual average DPM concentration in $\mu g/m^3$

URF_{DPM} Unit risk factor for DPM; estimated probability that a person will contract cancer as a result of inhalation of a DPM concentration of 1 $\mu g/m^3$ continuously over a period pf 70 years

LEA Lifetime exposure adjustment; values range from 0.14 to 1.0; see the discussion below

Acute and chronic non-cancer risks are considered significant if the project toxic air contaminant emissions result in a hazard index greater than or equal to 1. The hazard index is determined by calculating the average annual toxic concentration ($\mu g/m^3$) divided by the reference exposure level (REL) for a particular toxic. The REL is the concentration at which no adverse health impacts are anticipated and is established by OEHHA. The chronic REL for DPM was established by OEHHA as 5 $\mu g/m^3$. Non-cancer risk is estimated using the following equation:

$$HI_{DPM} = C_{DPM}/REL_{DPM}$$

where,

HI_{DPM} Hazard Index; an expression of the potential for non-cancer health effects.

C_{DPM} Annual average DPM concentration ($\mu g/m^3$)

REL_{DPM} Reference exposure level (REL) for DPM; the DPM concentration at which no adverse health effects are anticipated.

Discrete and grid receptor concentrations are detailed in the Health Risk Assessment prepared for the project. The highest concentration of DPM will occur at a commercial office building, located at 555 Technology Court, east of Research Park Drive (UTM 470097 Easting, 3762290 Northing) and west of the project site (See Appendix B, Health Risk Assessment). As summarized in Table 7 (Cancer and Non-Cancer Risk), incremental increases at this facility are less than the threshold of 10 in one million established by SCAQMD. The non-cancer hazard index at this facility is 0.005. This hazard index value is less than the threshold of 1.0 established by SCAQMD. The calculations in Table 7 show that no receptor will be exposed to an increase in cancer or non-cancer health risks in excess of SCAQMD thresholds.

Table 7
Cancer and Non-Cancer Risk

UTM							
E	N	Concentration	URF	LEA	Cancer Risk	REL	Hazard Index
470618	3762783	0.13240	0.0003	0.14	5.56080E-06	5	0.026
470408	3762829	0.00792	0.0003	0.66	1.56816E-06	5	0.002
470296	3762852	0.00613	0.0003	0.66	1.23174E-06	5	0.001
470081	3762975	0.00278	0.0003	0.66	5.50440E-07	5	0.001
470081	3762811	0.00647	0.0003	0.66	1.28106E-06	5	0.001
469840	3762940	0.00261	0.0003	0.66	5.16780E-07	5	0.001
469840	3762809	0.00560	0.0003	0.66	1.10880E-06	5	0.001
469877	3762620	0.00670	0.0003	0.66	1.32660E-06	5	0.001
469735	3762450	0.00652	0.0003	0.66	1.29096E-06	5	0.001
469864	3762440	0.00760	0.0003	0.66	1.50480E-06	5	0.002
469996	3762624	0.00746	0.0003	0.66	1.47708E-06	5	0.001
470125	3762596	0.00850	0.0003	0.66	1.68300E-06	5	0.002
470129	3762439	0.00949	0.0003	0.66	1.87902E-06	5	0.002
469696	3762214	0.00819	0.0003	0.66	1.62162E-06	5	0.002
469777	3762272	0.01604	0.0003	0.14	6.73680E-07	5	0.003
469784	3762162	0.00619	0.0003	0.66	1.22562E-06	5	0.001
469857	3762277	0.01774	0.0003	0.14	7.45080E-07	5	0.004
469623	3762096	0.00336	0.0003	0.66	6.65280E-07	5	0.001
469678	3762034	0.00285	0.0003	0.66	5.64300E-07	5	0.001
469728	3762088	0.00390	0.0003	0.66	7.72200E-07	5	0.001
469935	3762283	0.01978	0.0003	0.66	3.91644E-06	5	0.004
469909	3762142	0.00610	0.0003	0.66	1.20780E-06	5	0.001
469879	3762102	0.00492	0.0003	0.66	9.74160E-07	5	0.001
469836	3762056	0.00388	0.0003	0.66	7.68240E-07	5	0.001
470032	3762290	0.02287	0.0003	0.66	4.52826E-06	5	0.005
470028	3762181	0.00801	0.0003	0.66	1.58598E-06	5	0.002
470097	3762290	0.02307	0.0003	0.66	4.56786E-06	5	0.005
470193	3762273	0.01650	0.0003	0.66	3.26700E-06	5	0.003
470987	3762557	0.00811	0.0003	0.66	1.60578E-06	5	0.002
470942	3762447	0.00636	0.0003	0.66	1.25928E-06	5	0.001
470038	3762657	0.00461	0.0003	0.66	9.12780E-07	5	0.001
471277	3762664	0.00289	0.0003	0.66	5.72220E-07	5	0.001
471187	3762543	0.00379	0.0003	0.66	7.50420E-07	5	0.001
471122	3762394	0.00403	0.0003	0.66	7.97940E-07	5	0.001
				Thresholds	1.000E-05		1.000

* Commercial office building, highest discrete receptor DPM concentration

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to violate state and federal CO standards at intersections, even if the broader Basin is in attainment for federal and state levels. In general, SCAQMD and the California Department of Transportation *Project-Level Carbon Monoxide Protocol* (CO Protocol) recommend analysis of CO hotspots when a project increases traffic volumes at an intersection by more than two percent that is operating at LOS D or worse.[11] [12] According to Section 3.1.3 of the Protocol, the project is not regionally significant and therefore is only required to examine local impacts. A regionally significant project is a transportation project on a facility that serves regional transportation needs.

Localized impacts are analyzed in Protocol Section 4. The local analysis procedures in Section 4.7.1 indicate that the project has the potential to worsen air quality (as defined for Protocol purposes only) because it will result in an increase in the number of vehicles operating in *cold start* mode by more than two percent. *Cold Start* mode refers to a vehicle started after an hour or more being turned off. Outbound passenger vehicle trips during the afternoon peak hour will increase by approximately 21 percent at the intersection of Palmyrita Avenue at Michigan Avenue (105 project-related peak hour trips to 495 existing intersection peak hour trips). The project will also increase average daily trip (ADT) by approximately 42 percent (2,090 project-related ADT to 4,950 existing intersection ADT) and will likely result in some decrease in average speeds due to the increased traffic at the project site ingresses and egresses. The local analysis procedures then direct to Protocol Sections 4.7.3 and 4.7.4. These sections indicate that if the project involves signalized intersections performing at Level of Service (LOS) E or worse then the project will be subject to a screening analysis. The proposed project will involve signalized intersections operating at LOS E or worse as identified in the project traffic study and thus requires a screening analysis.

Section 4.4 references Appendix A of the Protocol for screening purposes; however, because of the age of the assumptions used in the screening procedures, they are no longer acceptable. The Sacramento Metropolitan Air Quality Management District (SAQMD) developed a screening threshold that states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis.[13] The project will not involve an intersection experiencing this level of traffic; therefore, the project passes the screening analysis and impacts are deemed acceptable. Based on the local analysis procedures, the project is satisfactory pursuant to the Protocol and will not result in a CO hotspot.

e) **No Impact.** According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals, paper, etc.). The proposed project is sited within an existing industrial area. The proposed warehouses are not considered sensitive receptors and therefore would not be substantially affected by potential odors from existing industrial operations. The proposed warehouses, in turn, do not produce odors that would affect a substantial number of people considering that the proposed warehouses will not result in the manufacturing of any products and that there are no sensitive receptors in the project vicinity; no impact will occur.

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11 California Department of Transportation. Transportation Project-Level Carbon Monoxide Protocol. 1997

12 South Coast Air Quality Management District. Initial Study (IS) and Draft Mitigated Negative Declaration (Draft MND) for the Proposed Project No. P200500723 The Alabama Business Center – Industrial Warehouse Facility. September 2006

13 Sacramento Metropolitan Air Quality Management District. CEQA Guide. May 2011

4.4 – Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☑	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☑
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☑
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☑
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☑

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☑

a) **Less Than Significant Impact With Mitigation Incorporation.** The project site has been cleared in preparation of a previous development plan and currently lacks any substantial vegetation. The biological assessment prepared for the project observed isolated buckwheat scrub along the southern border of the project site (see Appendix C, Biological Assessment). Adjacent to the project boundary to the south is a small stand of red willow, mulefat and tree tobacco within the drainage. Because these are isolated, fragmented occurrences, the impact will be less than significant. The site survey noted suitable burrowing owl habitat on the site, but no owls were observed during the time of the survey, and no burrowing owls are expected to occupy the site as long as the site is maintained regularly for weed control.[14] Although the biological site assessment determined that impacts would be less than significant, the following mitigation measure is required to ensure that impacts would remain less than significant.

Mitigation Measure BIO-1
A focused survey for burrowing owl shall be conducted 30 days prior to any project construction-related ground disturbance. The survey should be conducted according to the recommended guidelines of The Burrowing Owl Consortium (1993) as adopted under the WRCMSHCP. If animals are present, the following shall be required:

- As compensation for the direct loss of burrowing owl nesting and foraging habitat, the project proponent shall mitigate by acquiring and permanently protecting known burrowing owl nesting and foraging habitat at the following ratios (per The Burrowing Owl Consortium 1993 and the WRCMSHCP):

    1. Replacement of occupied habitat with occupied habitat at 1.5 times 6.5 acres per pair or single bird;

    2. Replacement of occupied habitat with habitat contiguous with occupied habitat at 2 times 6.5 acres per pair or single bird; and/or

    3. Replacement of occupied habitat with suitable unoccupied habitat at 3 times 6.5 acres per pair or single bird.

- All owls associated with occupied burrows, that will be directly impacted (temporarily or permanently) by the project, shall be relocated and the following measures shall be implemented to avoid take of owls:

    1. Occupied burrows shall not be disturbed during the nesting season of February 1 through August 31, unless a qualified biologist can verify through non-invasive methods that either the owls have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent flight.

[14] Natural Resources Assessment, Inc. Burrowing Owl Habitat Assessment, Assessor's Parcel Numbers 257-040-15, 18, 19, 20, 21, 22, 257-050-21, 22, 23, Columbia Business Center, Riverside, California. May 16, 2013.

2. Owls must be relocated by a qualified biologist from any occupied burrows that will be impacted by project activities. Suitable habitat must be available adjacent to or near the disturbance site or artificial burrows will need to be provided nearby. Once the biologist has confirmed that the owls have left the burrow, burrows should be excavated using hand tools and refilled to prevent reoccupation.

3. All relocation shall be approved by the California Department of Fish and Wildlife (Department). A qualified biologist shall monitor the relocated owls a minimum of three days per week for a minimum of three weeks. A report summarizing the results of the relocation and monitoring shall be submitted to the Department within 30 days following completion of the relocation and monitoring of the owls.

4. A Burrowing Owl Mitigation and Monitoring Plan shall be submitted to the Department for review and approval prior to relocation of owls. The Burrowing Owl Mitigation and Monitoring Plan shall describe proposed relocation and monitoring actions. The Plan shall include the number and location of occupied burrow site and details on adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation of artificial burrows (numbers, location, and type of burrows) shall also be included in the plan. The Plan shall also describe proposed off-site areas that are preserved to compensate for impacts to burrowing owls/occupied burrows at the project site as required under Condition 1.

b) **No Impact.** The project site has been cleared and does not contain any riparian features or habitat. No impact will occur.

c) **No Impact.** According to the federal National Wetlands Inventory, there are no data for the project site. The project site does not contain any wetlands and the proposed project will not disturb any offsite wetlands (see Section 4.9 for discussion of project drainage features).[15] In addition, the project biological assessment indicated that no wetlands occur on the project site. No impact will occur.

d) **No Impact.** The project site is surrounded by development on three sides, the site assessment determined that the fragmentation of habitat is preventing the use of the project site and surrounding area as a wildlife corridor. No impact will occur.

e) **No Impact.** The City of Riverside Municipal Code Section 15.08.020 prohibits the removal of trees or shrubs planted or growing in the public streets except pursuant to the policy established by the Park and Recreation Commission. The project site does not have any trees or shrubs growing in the street, therefore no street trees or shrubs will be removed. Therefore, no impact will occur.

f) **No Impact.** The proposed project is part of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The MSHCP is a multi-jurisdictional habitat-planning effort with the goal of maintaining biological and ecological diversity within a rapidly urbanizing region.[16] The MSHCP complies with Section 10(a)(2)(A) of the 1973 federal Endangered Species Act (FESA) and allows the "incidental take" of a listed species with an Incidental Take Permit. Continued participation with the MSHCP is desired by the

[15] United States Fish and Wildlife Service. National Wetlands Inventory. http://107.20.228.18/Wetlands/WetlandsMapper.html# [August 28, 2012]

[16] Western Riverside County Multiple Species Habitat Conservation Plan. http://www.rctlma.org/mshcp/volume1/sec1.html#1.1 [July 2013]

City and any new proposed project is required to comply with applicable provisions of the plan. No impact will result.

4.5 – Cultural Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?	☐	☐	☑	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	☐	☑	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☑	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☑	☐

a) **Less Than Significant Impact.** The project site was historically used for citrus groves and is currently cleared and vacant. The Historical/Archaeological Resources Survey conducted by CRM Tech suggests that the project remained unsettled throughout the historic period, and was probably used only for agricultural purposes (see Appendix D, Historical/Archaeological Resources Survey). In the mid-1850s, when the U.S. government conducted the earliest systematic land surveys in the Riverside area, the only built features found in the project vicinity were several roads passing nearby. No other evidence of human activities was reported in or near the project area at the time.

In the 1930s, a winding dirt road was observed along the southeastern edge of the project area, skirting around the base of the Sugarloaf/Box Springs Mountain. Other sources indicated that the course of the road was roughly identical to that of the irrigation line operated by the Riverside Highland Water Company, suggesting that it was almost certainly a maintenance road for the irrigation works. Originally built as a wooden flume in the 1890s, the irrigation line was replaced a short time later with a concrete flume at grade. Around 1939, a concrete pipeline was placed inside the concrete flume and then covered with topsoil. The Riverside Highland Water Company evidently diverted from Warm Creek, and the buried pipeline reportedly extended from the northern side of the Riverside-San Bernardino county line to Marlboro Avenue, just to the south of the project location.

During the 1950's-1960's, the entire project area was occupied by orchards, presumably citrus groves. Citrus cultivation continued on the property through a least the 1970s, and partially into the current century. Other than the citrus groves and the roads along the perimeters, including the maintenance road along the Riverside Highland Water Company pipeline, no notable features of the built environment were reported within or immediately adjacent to the project area in the 1950s-1970s.

During the field survey, irrigation features were noted along the southern project boundary. They were recorded into the California Historical Resources Inventory during this survey, and subsequently designated Site 33-022126/CA-RIV-11333 by the EIC. Among the features recorded at the site were a segment of mostly buried concrete pipeline and remnants of the irrigation system for the citrus groves that once occupied the property, including eleven concrete standpipes and four concrete weir boxes.

The pipeline is exposed at some spots, demonstrating a diameter of 1.5 feet, and apparently remains functional. The length of the entire pipeline is unknown, but the length within the project area is approximately 1,800 feet. Judging by its location and course along the base of the Sugarloaf/Box Springs Mountain, this is the pipeline built by the Riverside Highland Water Company around 1939. The pipeline is no longer in use and will be demolished and removed prior to project construction.

The other features at Site 33-022126, once parts of the water delivery system for the citrus groves covering the property, are typical of the fragmented remnants of historic-period agricultural infrastructure that are commonly found on former farmlands throughout southern California. Features like these generally do not bear a close association with the productive lives of important historic figures or significant events even if their historical background can be better documented from available sources. There is no evidence that these features embody the distinctive characteristics of any type, period, region, or method of construction. Based on these considerations, Site 33-022126 does not appear eligible for listing in the National Register of Historic Places or the California Register for Historical Resources, or for local designation by the City of Riverside. Impacts will be less than significant.

b) **Less Than Significant Impact with Mitigation Incorporation.** The project site has been previously graded and will not involve import or export of soil. Any buried archaeological resources would have already been uncovered or destroyed at the time of initial grading of the project site. In addition, in a letter dated April 19, 2013 (see Appendix D), the Native American Heritage Commission stated that the there is no indication of Native American cultural resources in the project area. However, such resources have been reported in close proximity of the project site. In the unlikely event that archeological materials are uncovered, Mitigation Measure C-1 is incorporated to ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified anthropologist. Native American monitoring is included to provide assistance in identifying potential resources, as requested through tribal consultation. Impacts to buried archaeological resources will be less than significant with mitigation incorporation.

Mitigation Measure

C-1 If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and to retain a professional archaeologist to examine the materials to determine whether it is a *unique archaeological resource* as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.

c) **Less Than Significant Impact.** The project site has been previously graded and will not involve import or export of soil. Any buried paleontological resources would have already been

uncovered or destroyed at the time of initial grading of the project site. However, the according to the Riverside County Land Information System, the northwestern portion of the project site has a high paleontological sensitivity potential.[17] In the event that paleontological materials are uncovered, Mitigation Measure C-2 is incorporated to ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified anthropologist. Impacts to paleontological resources will be less than significant with mitigation incorporation.

Mitigation Measure

C-2 If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.

d) **Less Than Significant Impact.** Since the project site has already been graded, no human remains or cemeteries are anticipated to be disturbed by the proposed project. Grading activities for the proposed development will be limited in scale so as to minimally disturb the existing grade. Any buried human remains would have been uncovered or destroyed at that time of initial grading of the site. In the unlikely event that human remains are uncovered, the project would comply with CEQA requirements, including halting construction activities until a County coroner can evaluate the find and notify a Native American Representative if the remains are of Native American origin. Compliance with these regulations will result in less than significant impacts.

[17] Riverside County Land Information System. http://www3.tlma.co.riverside.ca.us/pa/rclis/viewer.htm [January 2014]

4.6 – Geology and Soils

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☑
ii) Strong seismic ground shaking?	☐	☐	☑	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☑	☐
iv) Landslides?	☐	☐	☑	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☑	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☑	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☐	☑

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☑

a.i) **No Impact.** The proposed project is not located on a known fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map.[18] No impact will occur.

a.ii) **Less Than Significant Impact.** The proposed project will be subject to ground shaking impacts should a major earthquake occur in the future. Potential impacts include injury or loss of life and property damage.

The proposed project is subject to the seismic design criteria of the California Building Code (CBC) and the project-specific design requirements of the project geotechnical report. Adherence to these requirements will reduce the potential of the buildings from collapse during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements will minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Adherence to existing regulations will reduce the risk of loss, injury, and death; impacts due to strong ground shaking will be less than significant.

a.iii) **Less Than Significant Impact.** The Riverside General Plan EIR indicates that the project is located within an area with low liquefaction potential.[19] In addition, the geotechnical report determined that subsurface conditions on site are not susceptible to liquefaction (see Appendix E, Geotechnical Investigation/Geotechnical Infiltration Report).[20] The proposed project would be subject to standard CBC measures to provide for sound structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Therefore, based on the determination of the geotechnical report that on-site conditions are not susceptible to liquefaction and with adherence to CBC requirements, project impacts will be less than significant.

a.iv) **Less Than Significant Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site is relatively flat. However, the Box Springs Mountain is located to the south of the site and contains slopes up to 30 percent or more.[21] General Plan Public Safety Policy PS-9.8 requires feasible mitigation of geologic impacts to reduce risk to the community from hazards related to geologic conditions, seismic activity, flooding and structural and wildland fires. Impacts will be reduced to less than significant levels.

b) **Less Than Significant Impact.** Erosion and loss of topsoil could result in damage to on-site structures and landscaping or to neighboring properties. Erosion can also impact downstream

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18 California Department of Conservation. Special Study Zones. San Bernardino South Quadrangle. 1977.

19 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

20 Southern California Geotechnical. *Geotechnical Investigation Proposed Commercial/Industrial Buildings. SEC Michigan Avenue and Palmyrita Avenue, Riverside, California for Columbia Business Center, LLC.* August 29, 2013.

21 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

water bodies while loss of nutrient-rich topsoil impacts the ability for vegetation to grow. The proposed project is subject to SCAQMD Rule 403 and the erosion control requirements of the CBC to prevent wind-blown and stormwater-related erosion. Rule 403 will minimize wind-blown erosion by requiring stabilization of disturbed soils during construction activities through measures such as daily watering. Required erosion control plans will ensure that measures are implemented at project sites to prevent or minimize erosion due to rain, ensuring that downstream water bodies are protected from sedimentation. With implementation of existing regulations, impacts due to erosion and loss of topsoil will be less than significant.

c) **Less Than Significant Impact.** As stated in the Section 4.a.iii), the soils on the project site contain low potential for liquefaction. Based on the project site's slope conditions being relatively flat, potential for lateral spreading and landslide would be minimal. In addition, groundwater is expected to be at a depth greater than 40.5 feet.[22] The geotechnical report prepared for the project site determined that near surface soils have the potential for collapse when exposed to moisture infiltration and have potential for consolidation when exposed to load increases in the range of those that would be exerted by the foundations of new structures. In addition, minor shrinkage and ground subsidence has the potential to occur in the soils below the zone of removal due to settlement and machinery. Standard CBC and recommendations from the required preliminary soils report (Municipal Code Section 18.090.050) will be implemented during grading. Impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse will be less than significant with implementation of the proposed recommendations included in the geotechnical report.

d) **No Impact.** Expansive soils shrink and swell in response to moisture due to high percentages of clay. Expansive soils can result in damage to structures when clay within the soil swells due to moisture. The project site is not located on soil with high shrink-swell potential according to the Riverside General Plan EIR.[23] In addition, the geotechnical report prepared for the project site found that the expansion potential of on-site soils is very low.[24] No impact will occur.

e) **No Impact.** The project site is served by a fully functional sewer system. The project will connect to this system and will not require use of septic tanks. No impact will occur.

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22 Southern California Geotechnical. *Geotechnical Investigation Proposed Commercial/Industrial Buildings. SEC Michigan Avenue and Palmyrita Avenue, Riverside, California for Columbia Business Center, LLC.* August 29, 2013.

23 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

24 Southern California Geotechnical. *Geotechnical Investigation Proposed Commercial/Industrial Buildings. SEC Michigan Avenue and Palmyrita Avenue, Riverside, California for Columbia Business Center, LLC.* August 29, 2013.

4.7 – Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☑	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☑	☐

a) **Less Than Significant Impact with Mitigation Incorporation.** Climate change is the distinct change in measures of climate for a long period of time.[25] Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e. changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices.

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

GHG emissions for the project were quantified utilizing the California Emissions Estimator Model (CalEEMod) version 2013.2.2 to determine if the project could have a cumulatively considerable

[25] United States Environmental Protection Agency. Frequently Asked Questions About Global Warming and Climate Change. Back to Basics. April 2009.

impact related to greenhouse gas emissions (see Appendix A, Air Quality/GHG Assessment).[26] The emissions inventory accounts for GHG emissions from construction activities and operational activities.

Operation emissions associated with the proposed project would include GHG emissions from mobile sources (transportation), energy, water use and treatment, waste disposal, and area sources. GHG emissions from electricity use are indirect GHG emissions from the energy (purchased energy) that is produced offsite. Area sources are owned or controlled by the project (e.g., natural gas combustion, boilers, and furnaces) and produced onsite. Construction activities are short term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, SCAQMD recommends amortizing construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions in order to generate a precise project-based GHG inventory. Total construction emissions are summarized in Table 8 (Total Project Construction Greenhouse Gas Emissions).

Table 8
Total Project Construction Greenhouse Gas Emissions

	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Building A	6,877.63	0.51	0.00	6,888.39
Building B	1,339.97	0.15	0.00	1,343.13
Building C	583.96	0.09	0.00	585.91
SUB-TOTAL	8,801.56	0.75	0.00	8,817.43
*AMORTIZED TOTAL^*	*293.39*	*0.025*	*0.00*	*293.91*

* MTCO2E
Note: Slight variations may occur due to rounding and variations in modeling software
^ Amortized over 30-years

A summary of the project's long-term greenhouse gas emissions inventory is included in Table 9 (Long-Term Greenhouse Gas Emissions). The emissions inventory is presented as metric tons of carbon dioxide equivalent (MTCO2E) meaning that all emissions have been weighted based on their Global Warming Potential (GWP) (a metric ton is equal to 1.102 US short tons). Mobile sources are based on annual vehicle miles traveled (VMT) based on daily trip generation identified in the project traffic study.[27] Trip lengths have been adjusted based on a study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program. According to observed data collected in the field for the Southern California Association of Governments (SCAG) region, trip lengths for warehouse uses are estimated at 5.92 miles for light-duty trucks, 13.06 for medium-duty trucks, and 22.40 for heavy-duty trucks. Total vehicle miles were calculated using the average daily trips for each vehicle class and divided by total daily truck trips to get to an average truck distance of 17.41 miles. Natural gas usage, electricity usage, water/wastewater demand, and solid waste disposal are based on default demand figures utilized in CalEEMod.

Landscape irrigation requirements were calculated using the California Department of Water Resources (DWR) *Water Budget* Workbook that calculates the Maximum Applied Water Allowance (MAWA) for landscaping based on the requirements of the state water conservation in landscaping

[26] MIG|Hogle-Ireland, Inc. Columbia Business Center Air Quality & Climate Change Assessment. November 2013.
[27] Kunzman Associates, Inc. Invesco Columbia Center Traffic Impact Analysis. May 30, 2014.

act because CalEEMod does not provide this default for warehouse uses.[28] This reflects the maximum allowable amount of water that is permitted to be used. MAWA is calculated using the following equation:

$MAWA = ET_O * 0.62 * [(0.70 * LA) + (0.30 * SLA)]$

Where:

MAWA = Maximum Applied Water Allowance (gallons per year)
ET_O = Reference Evapotranspiration for Locale (inches per year)
LA = Landscape Area (square feet)
SLA = Special Landscape Area (square feet)

Estimated irrigation needs for drought tolerant landscaping was calculated at 6,091,821 gallons per year.

Table 9
Long-Term Greenhouse Gas Emissions

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Area	0.11	0.00	0.00	0.12
Energy	3,362.91	0.07	0.02	3,369.87
Mobile	6,743.48	0.15	0.00	6,746.65
Solid Waste	523.00	30.91	0.00	1,172.07
Water/Wastewater	56.52	0.02	0.00	57.46
TOTAL	*10,686.02*	*31.15*	*0.2*	*11,346.18*
* MTCO2E/YR Note: Slight variations may occur due to rounding				

Carbon Sequestration

CalEEMod, utilizing the methodology in the CAPCOA mitigation handbook, was used to determine changes in carbon sequestration on the project site; these changes are summarized in Table 10 (Carbon Sequestration). Currently, there are no trees on the project site. The project includes planting of 966 new trees including a mix of hardwoods. The 966 trees will accumulate approximately 709.044 MTCO2E per year.

Table 10
Carbon Sequestration

	Trees	Acres	Sequestration (MTCO2E/YR)
Proposed Landscaping	966	--	+709.044
Yearly Accumulation			**+709.044**

Greenhouse Gas Emissions Inventory

Table 11 (Greenhouse Gas Emissions Inventory) summarizes the yearly estimated greenhouse gas emissions from construction of the project, operational sources, and sequestration from proposed landscaping. The total yearly carbon dioxide equivalent emissions are estimated at 10,931.05 MTCO2E. This exceeds the SCAQMD threshold of 10,000 MTCO2E/YR.

[28] California Department of Water Resources. Water Budget Workbook. www.water.ca.gov/wateruseefficiency/docs/WaterBudget.xls [August 15, 2012]

Table 11
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Construction^	293.39	0.025	0.00	293.91
Operational	10,686.02	31.15	0.02	11,346.18
SUB-TOTAL	*10,979.41*	*31.18*	*0.02*	*11,640.09*
Trees (Credit)	-709.04	0.00	0.00	-709.04
Grand Total	**10,270.37**	**31.18**	**0.02**	**10,931.05**

* MTCO2E/YR
Note: Slight variations may occur due to rounding
^ Construction impacts amortized over 30-years

Greenhouse gas emissions from the project were evaluated in light of project design features and existing regulations to determine if emissions could be reduced below the 10,000 MTCO2E threshold without the need for incorporation of mitigation measures. Project design features include energy efficiency building design and water efficient landscaping. Project design features and regulatory requirements are listed below.

Emissions Reductions

High Efficiency Lighting (LE-1)
The project proponent will install high-efficiency lighting. *High-efficiency* for purposes of this study is defined as a minimum 25 percent reduction in energy demand over typical lighting. The requirement for use of high-efficiency lighting is incorporated as Mitigation Measure GHG-1.

Water Efficient Landscaping (WUW-3)
Proposed landscaping has been designed to be water efficient in accordance with State and City water efficient landscape requirements. Based on the proposed landscape design, maximum allowable water use was calculated at 15,137,254 gallons. The estimated total water use was calculated at 6,091,821 gallons, an approximate 59.8 percent reduction in outdoor water demand.

Recycling Services (SW-1)
Pursuant to the mandatory commercial recycling requirements of AB341, a minimum of 50 percent of all solid waste will be recycled at each of the proposed warehouses.

With incorporation of Mitigation Measure GHG-1 and consideration of project design features and existing regulatory requirements, the proposed warehouses will emit approximately 9,798.65 MTCO2E per year accounting for construction and operational sources as summarized in Table 12 (Mitigated Greenhouse Gas Emissions Inventory). This does not exceed the 10,000 MTCO2E/YR thresholds established by SCAQMD.

Table 12
Mitigated Greenhouse Gas Emissions Inventory

Source	GHG Emissions (MT/YR)			
	CO_2	CH_4	N_2O	TOTAL*
Construction^	293.39	0.025	0.00	293.91
Operational	9,879.22	15.68	0.02	10,213.78
SUB-TOTAL	10,172.61	15.71	0.02	10,507.69
Forest (Credit)	-709.04	0.00	0.00	-709.04
Grand Total	**9,464.57**	**15.71**	**0.02**	**9,798.65**

* MTCO2E/YR
Note: Slight variations may occur due to rounding
^ Construction impacts amortized over 30-years

Mitigation Measure GHG-1
Prior to issuance of occupancy permits or business licenses, buildings shall have installed high-efficiency lighting with a minimum reduction in energy demand of 25 percent below typical lighting. Installation of high-efficiency lighting shall be verified by the Building and Safety Division.

b) **Less Than Significant Impact..** The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim Greenhouse Gas (GHG) threshold. As indicated in Question A, above, the project would comply with the City's General Plan policies, Municipal Code Chapter 16.07 (Green Code), and State Building Code provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction of the project and, as demonstrated in the Climate Change Analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Based upon the prepared Climate Change Analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus a less than significant impact will occur directly, indirectly and cumulatively in this regard.

4.8 – Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☑	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☑	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☑
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☑
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☑
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☑	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☑	☐

a) **Less Than Significant Impact.** The proposed project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility which routinely transports, uses, or disposes of hazardous materials. According to the EPA, the proposed project is located near four listed facilities that produce hazardous wastes:[29]

- A & A Plating, 796 Palmyrita Avenue Unit B-C, Riverside, CA 92507
- Amazon Environmental Inc., 779 Palmyrita Avenue, Riverside, CA 92507
- Astro Seal Inc., 827 Palmyrita Avenue Unit B, Riverside, CA 92507
- Centrum Analytical Labs, 1401 Research Park Drive, Riverside, CA 92507

Hazardous facilities are subject to applicable federal and state emissions thresholds for reporting and mitigation when necessary. Handling and transporting of materials by these facilities is also subject to pertinent regulations to minimize the potential for accidental releases and specify response procedures if an accident occurs. With these facilities following existing regulations for reporting, emitting, and handling of hazardous materials, impacts to the future tenants and visitors to the project would be less than significant.

The proposed project will not necessarily, but may engage in the routine transport, use, or disposal of hazardous materials or wastes. If hazardous materials are proposed on site in the future, they will be subject to state and federal regulation for permitting and inspection by the Hazardous Materials Division of the City Fire Department. Widely used hazardous materials common at any warehouse land use include paints and other solvents, cleaners, automobile fluids, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes used motor oil, dead batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport, use of hazardous materials or wastes will be less than significant.

b) **Less Than Significant Impact.** Construction of the proposed project and future tenant improvements will require the use and transport of hazardous materials such as asphalt, paints, and other solvents. Construction activities could also produce hazardous wastes associated with the use of such products. Construction of the proposed project requires ordinary construction activities and will not require a substantial or uncommon amount of hazardous materials to complete. Although if future tenant improvements of the proposed buildings would not be subject to CEQA review, all hazardous materials are required to be utilized and transported in accordance

[29] United States Environmental Protection Agency. Envirofacts. http://www.epa.gov/enviro/index.html [July 2013]

with their labeling pursuant to federal and state law. Because of these existing regulations, construction activities do not pose a substantial risk to the public or the environment due to the use of hazardous materials; impacts will be less than significant.

c) **No Impact.** No schools are located within one-quarter mile of the project site. Therefore, no impact will occur.

d) **No Impact.** The proposed project is not located on a site listed on the State 'Cortese List', a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses. Therefore, no impact will occur.

Based upon review of the Cortese list, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),[30]
- listed as a leaking underground storage tank (LUFT) site by the State Water Resources Control Board (SWRCB),[31]
- listed as a hazardous solid waste disposal site by the SWRCB,[32]
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,[33] or
- developed with a hazardous waste facility subject to corrective action by the DTSC.[34]

In addition, a preliminary environmental site assessment was prepared for the northern portion of the project site (see Appendix F, Preliminary Environmental Site Assessment). The proposed project site was previously used for agricultural purposes. To ensure that contamination from pesticide storage and use has not occurred, soil samples were collected at five locations. The preliminary environmental site assessment concluded that there were no unusually high concentrations of pesticides, herbicides, or heavy metals on site. There will be no impact.

e-f) **No Impact.** The proposed project is not located within two miles of a public or private airstrip or within an airport land use plan. No Impact will occur.

g) **Less Than Significant Impact.** The proposed project site is currently vacant. The project will therefore increase trips in the area. Per state Fire and Building codes, sufficient space will have to be provided around the buildings for emergency personnel and equipment access and emergency evacuation. All project elements, including landscaping, would be sited with sufficient clearance from existing and proposed structures so as not to interfere with emergency access to and evacuation from the site. The project is required to comply with the California Fire Code (Title 24, California Code of Regulations, Section 9). The site plan includes five ingress/egress access points: four driveways on Palmyrita Avenue and one driveway on Michigan Avenue. One driveway on Palmyrita Avenue and the driveway on Michigan Avenue will provide access to Building A, two driveways on Palmyrita Avenue will provide access to Building B, and one driveway on Palmyrita Avenue will provide access to Building C.

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30 California Department of Toxic Substances Control. EnviroStor. www.envirostor.dtsc.ca.gov/public/search.asp [July 2013]

31 California State Water Resources Control Board. GeoTracker. geotracker.waterboards.ca.gov [July 2013]

32 California State Water Resources Control Board. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf [July 2013]

33 California State Water Resources Control Board. List of Active CDO and CAO. http://www.calepa.ca.gov/sitecleanup/corteselist/ [July 2013]

34 California Department of Toxic Substances Control. Hazardous Facilities Subject to Corrective Action. www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities [July 2013]

The project driveways will allow emergency access and evacuation from the site, and would be constructed to California Fire Code specifications. The project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the buildings would be limited to lateral utility connections that would be limited to nominal potential traffic diversion. Traffic control will be provided for any lane closures. Project impacts would be less than significant.

h) **Less Than Significant Impact.** The project site has been graded and is surrounded to the west, north, and east by other primarily developed parcels consisting of industrial land uses. According to the Riverside General Plan EIR, the project site is not located in a high fire hazard area.[35] However, the Box Springs Mountain is located to the south of the project site, which is a very high fire hazard area.

The entire project will be required to comply with the City Ordinances and State requirements identified above through the Building and Safety plan check process. The proposed project will not increase the risk from wildland fires beyond the risk that is currently surrounding the existing project site, and will be required to comply with all regulations relating to fire hazards. Therefore, based upon the project's compliance with regulations to reduce risk from wildland fires, the project will have a less than significant impact to exposing people or structures to wildfire.

[35] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.9 – Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☑	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☑	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☑	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☑	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☑	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☑

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☑
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☑	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☑	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☑	☐

a) **Less Than Significant Impact.** Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The project consists of the development of three warehouse buildings totaling 1,461,449 square feet and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas
- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks
- Salt from irrigation practices and acid drainage from abandoned mines
- Bacteria and nutrients from livestock, pet wastes, and faulty septic systems
- Atmospheric deposition and hydromodification

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site

management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

The Santa Ana Regional Water Quality Control Board (RWQCB) administers the National Pollutant Discharge Elimination System (NPDES) permit in the region. The City is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The proposed project would not interfere with the implementation of NPDES water quality regulations and standards.

The proposed project would disturb approximately 72.5 acres of land and therefore will be subject to National Pollutant Discharge Elimination System (NPDES) permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a Storm Water Pollution Prevention Plan (SWPPP) that will include BMPs protects water quality during construction activities. The City will require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. These measures, which include resident/owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, trash racks, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City's storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted to the City for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations.

b) **Less Than Significant Impact.** If the project removed an existing groundwater recharge area or substantially reduced runoff that results in groundwater recharge, a potentially significant impact could occur.

The site is currently vacant. The proposed project will construct impervious pavement with areas of landscaping as well as two detention basins that could provide for similar levels of, groundwater recharge compared to the existing conditions. The site does not accommodate any substantial natural drainage or managed recharge areas. The project site is surrounded by development to the west, north, and east. To the south is the Box Springs Mountain and regional parkland. The City of Riverside is served by City of Riverside Public Utilities (RPU). Domestic water is provided via groundwater basins. According to the General Plan EIR, recharge areas for the primary groundwater aquifer utilized by RPU is located in other jurisdictions. Therefore, development within the City of Riverside will not affect groundwater recharge. The project site is not the location of an existing groundwater spreading basin and will not significantly change the runoff from the project that may otherwise recharge groundwater basins; therefore, impacts to groundwater recharge will be less than significant.

c) **Less Than Significant Impact.** Potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the project results in substantial on- or off-site erosion or siltation. As was previously detailed in Section 3.9.b, the site is vacant but surrounded by development to the west, north, and east. The project site is a currently vacant,

dirt lot. The site generally surface drains north-westerly to Palmyrita Avenue and Michigan Avenue.

Proposed on-site low impact development (LID) principles include the implementation of BMPs including landscaping, bioretention areas, and ponding areas. A Project Specific Preliminary Water Quality Management Plan (WQMP) has been prepared for the proposed project and is included in Appendix G. The WQMP indentifies proposed drainage management areas and the effectiveness of proposed BMPs. Implementation of bioretention and ponding BMPs will capture a volume of approximately 149,360 cubic feet. According to the WQMP, proposed LID BMPs fully address all drainage management areas and no alternative compliance measures are required for the proposed project.

The design of the proposed project will not substantially alter drainage patterns in the area to the extent that substantial on- or off-site erosion or siltation will occur; therefore, impacts will be less than significant.

d) **Less Than Significant Impact.** As was previously detailed in Section 3.9.c herein, the project would not result in an alteration of the drainage pattern or increase in flows that would result in flooding on- or off-site because all on- and off-site drainage will be controlled by storm drain and flood control facilities. The proposed project's detention basins have been designed to accommodate enough runoff to reduce proposed runoff to amounts that can be accommodated with existing infrastructure. Impacts to flooding on- or off-site as a result of a change in the drainage pattern or increase in runoff will thus be less than significant.

e) **Less Than Significant Impact.** A potentially significant impact could occur if the project creates or contributes runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff. As was previously detailed in Section 3.9.c, project-related stormwater flows will be directed to the proposed water quality/detention basins prior to outlet to existing storm drain facilities. The proposed water quality function of the basins would reduce the amount of polluted runoff that would be conveyed into the storm drain system. Impacts will be less than significant.

f) **No Impact.** The project does not propose any uses that will have the potential to otherwise degrade water quality beyond those issues discussed in Section 3.9 herein.

g) **No Impact.** The project does not include housing, therefore no impact will occur.

h) **Less Than Significant Impact.** The proposed project is not located within a designated 100-year flood hazard area or zone.[36] Therefore, the project will not impede or redirect flood flows. The project will have a less than significant impact.

i) **Less Than Significant Impact.** The project site is not located within a dam inundation area.[37] Impacts due to levee failure will be less than significant.

j) **Less Than Significant Impact.** The project site is not located near any lakes or other bodies of water that would be subject to potential seiche. The project site is located approximately forty-eight miles from the Pacific Ocean. Due to the distance, no impact from tsunami will occur.

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[36] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

[37] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

There is potential for mudflow near the project site associated with erosion and fire damage that may occur at the Box Springs Mountain. The area surrounding the Mountain is designated for open space and recreation. If mudflow were to occur at the Box Springs Mountain, limited nuisance mudflows may occur. The City requires standard construction BMPs to control erosion and protect areas with steep slopes for all new developments. Impacts will be less than significant.

4.10 – Land Use and Planning

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☑
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☑	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☑

a) **No Impact.** The project is surrounded by industrial uses to the west, north, and east with the Box Springs Mountain Regional Park to the south. The proposed project is consistent and compatible with the surrounding land uses and will not be dividing an established community. The project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. Therefore, no impact will occur.

b) **Less Than Significant Impact.** The proposed project consists of three speculative warehouse buildings. A Conditional Use Permit is proposed as Building A is greater than the maximum 400,000 square feet allowed without a Conditional Use Permit. In addition, a Variance is requested for Building A to exceed the maximum height of 45 feet to 56 feet. The proposed project requires a General Plan Amendment and Specific Plan Amendment to eliminate the extension of Columbia Avenue east of Michigan Avenue. The function of the Columbia Loop will then be related along Michigan Avenue connecting Palmyrita Avenue and Columbia Avenue with a striped Class 2 bike lane and six-foot sidewalk at the curb. The proposed project would not conflict with any plans or programs adopted to avoid or mitigate an environmental impact. The proposed industrial project is also subject to General Plan EIR mitigation measures and Hunter Business Park Specific Plan guidelines designed to avoid cumulative and site specific environmental impacts, as well as other applicable regulations required to mitigate or avoid environmental impacts. Therefore, there will be no conflict between the proposed project and plans, policies, or regulations designed to avoid or mitigate environmental impacts; a less than significant impact will occur.

c) **No Impact.** The project site is subject to the Riverside County Multiple Species Habitat Conservation Plan (MSHCP). All new development is required to comply with the MSHCP, therefore no conflict will occur.

4.11 – Mineral Resources

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☑	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☑

a) **Less than Significant Impact.** The project site is located within a MRZ-4 area, which indicates that there is insufficient data to assign any other MRZ designation.[38] Mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. Industrial uses are defined as incompatible land uses to mining operations.[39] Less than significant impact will occur.

b) **No Impact.** The City's General Plan does not identify any locally important mineral resources, other than those associated with past mining activities. Maximum potential for those deposits have been reached. The project site is currently vacant and is not used for mineral extraction or mining, therefore the proposed project would not result in any loss of availability of any known or unknown locally important mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and zoning and surrounding land uses would preclude mining from occurring. No impact will occur.

[38] Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

[39] California Department of Conservation, State Mining and Geology Board. Guidelines for Classification and Designation of Mineral Lands. 2000.

4.12 – Noise

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☑	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☑	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☑	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☑

Noise can be defined as unwanted sound. Sound (and therefore noise) consists of energy waves that people receive and interpret. Sound pressure levels are described in logarithmic units of ratios of sound pressures to a reference pressure, squared. These units are called *bels*. In order to provide a finer description of sound, a *bel* is subdivided into ten *decibels*, abbreviated dB. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA). Since decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. For example, if one automobile produces a sound pressure level of 70 dBA when it passes an observer, two 2 cars passing

simultaneously would not produce 140 dBA. In fact, they would combine to produce 73 dBA. This same principle can be applied to other traffic quantities as well. In other words, doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3 dBA. Conversely, halving the traffic volume or speed will reduce the traffic noise level by 3 dBA. A 3 dBA change in sound is the beginning at which humans generally notice a *barely perceptible* change in sound and a 5 dBA change is generally *readily perceptible*.[40]

Noise consists of pitch, loudness, and duration; therefore, a variety of methods for measuring noise has been developed. According to the California General Plan Guidelines for Noise Elements, the following are common metrics for measuring noise:[41]

L_{EQ} (Equivalent Energy Noise Level): The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over given sample periods. L_{EQ} is typically computed over 1-, 8-, and 24-hour sample periods.

CNEL (Community Noise Equivalent Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00pm to 10:00pm and after addition of ten decibels to sound levels in the night from 10:00pm to 7:00am.

L_{DN} (Day-Night Average Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of ten decibels to sound levels in the night after 10:00pm and before 7:00am.

CNEL and L_{DN} are utilized for describing ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. L_{EQ} is better utilized for describing specific and consistent sources because of the shorter reference period.

a) **Less Than Significant Impact.** The City of Riverside General Plan has established noise compatibility standards for land uses throughout the city. [42] Interior noise levels for sensitive receptors, such as residential uses, are considered acceptable up to 45 dBA CNEL. Exterior noise levels for office/commercial land uses are considered acceptable up to 65 dBA CNEL. Exterior noise levels for industrial land uses are considered acceptable up to 70 dBA CNEL. Existing land uses surrounding the project site and within the project vicinity generally consist of office and industrial facilities. These uses will generate typical urban noises that will not substantially impact the development. The project site is not within the existing 60, 65 or 70 dBA CNEL contours for roadways, freeways, and railroads; therefore, the proposed project will not be exposed to traffic generated noise levels in excess of acceptable levels.[43] Noise contours for 2025 built out General Plan conditions are included in the General Plan EIR. The proposed project is not located within the 70 CNEL, 65 CNEL, or 60 CNEL noise contours at build out.[44] Impacts related to exposure of the proposed project to noise levels in excess of General Plan standards will be less than significant.

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40 California Department of Transportation. Basics of Highway Noise: Technical Noise Supplement. November 2009.

41 California Governor's Office of Planning and Research. General Plan Guidelines. 2003

42 City of Riverside General Plan Noise Element.

43 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

44 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

b) **Less Than Significant Impact.** Vibration is the movement of mass over time. It is described in terms of frequency and amplitude and unlike sound; there is no standard way of measuring and reporting amplitude. Vibration can be described in units of velocity (inches per second) or discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts to buildings are generally discussed in terms of peak particle velocity (PPV) that describes particle movement over time (in terms of physical displacement of mass). For purposes of this analysis, PPV will be used to describe all vibration for ease of reading and comparison. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (such as crack plaster or destroy windows). Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments such as electron microscopes. Common sources of vibration within communities include construction activities and railroads. Operation of the proposed facility does not include uses that cause vibration and the nearest railroad is located west of Northgate Street, approximately 0.5 miles west of the project site.

Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities. Next to pile driving, grading activity has the greatest potential for vibration impacts if large bulldozers, large trucks, or other heavy equipment are used. Construction of the project does not require rock blasting or pile driving. The remaining construction phases do not require equipment that could result in appreciable levels of vibration. There are no sensitive noise and vibration receptors in the project area. Construction-related vibration impacts will be less than significant.

c) **Less Than Significant Impact.** The proposed project would increase ambient noise levels if it increased traffic generation in the project vicinity. The project is anticipated to generate approximately 2,626 daily trips.[45] As discussed previously, increases in traffic-generated noise will only be perceptible to the community if traffic levels double on any roadway. Roadways in the project vicinity and the number of vehicles they carry per day in the study area are detailed in the Traffic Impact Study prepared by Kunzman Associates as follows:

- Primer Street – up to 15,100 per day
- West La Cadena Drive – up to 9,600 vehicles per day
- East La Cadena Drive – up to 8,000 vehicles per day
- Chicago Avenue – up to 13,400 vehicles per day
- Iowa Avenue – up to 23,200 vehicles per day
- Michigan Avenue – up to 3,100 vehicles per day
- Palmyrita Avenue – up to 8,300 vehicles per day
- Interchange Street – up to 15,500 vehicles per day
- Columbia Avenue- up to 27,200 vehicles per day
- Marlborough Avenue – up to 3,000 vehicles per day
- Spruce Street – up to 12,400 vehicles per day
- Massachusetts Avenue – up to 3,900 vehicles per day
- 3rd Street/Blaine Street – up to 26,400 vehicles per day

The project would not double traffic on any of the surrounding roadways listed above and, therefore, will not result in *perceptible* increase in traffic-related noise of 3 dBA. Impacts will be less than significant.

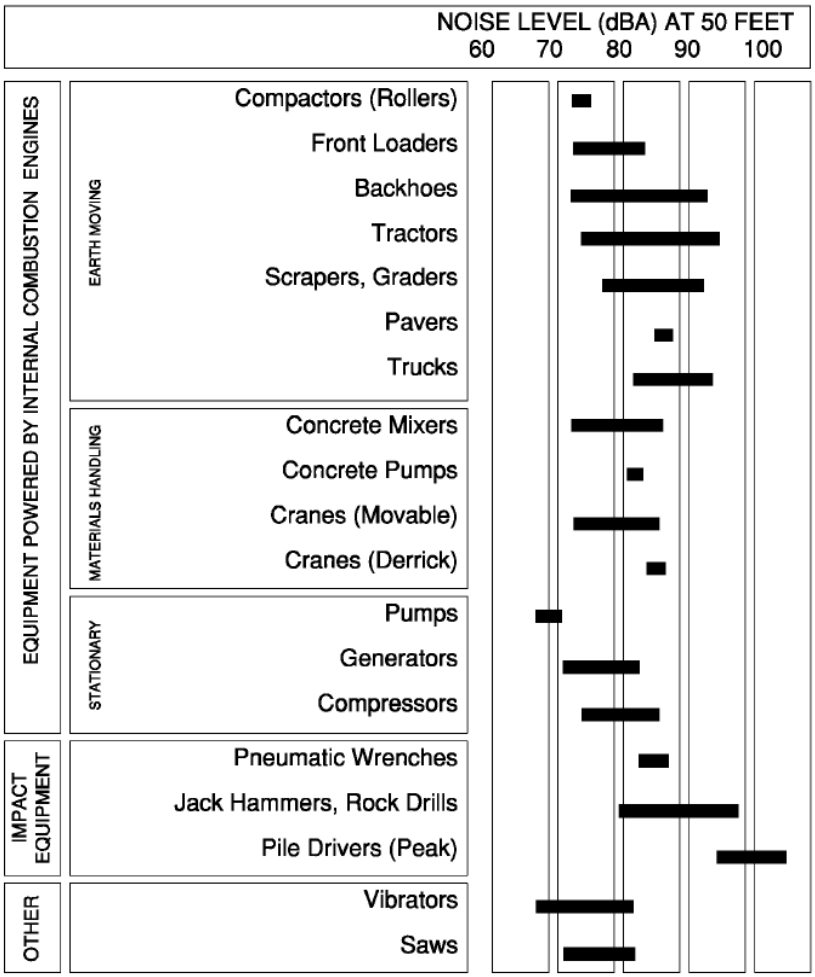
d) **Less Than Significant Impact.** Operationally, the project will result in periodic landscaping and other occasional noise generating activities. These activities are common in industrial uses

[45] Kunzman Associates, Inc. Invesco Columbia Center Traffic Impact Analysis. May 30, 2014.

and do not represent a substantial increase in periodic noise in consideration that the project vicinity is characterized primarily by industrial uses. Furthermore, the project is subject to Zoning Code Section 7.25.010 that limits noise levels to 70 dBA for industrial land uses. With compliance with this existing regulation, periodic operational noise increases will be less than significant.

The project will result in temporary construction-related noise increases related to on-site ground disturbing and construction activities. Construction noise levels vary, depending on the type and intensity of construction activity, equipment type and duration of use, and the distance between the noise sources and the receiver. Typical sound emission characteristics of construction equipment are provided in Figure 1 (Construction Equipment Noise).

Figure 1
Construction Equipment Noise



NOTE: Based on limited available data samples.

SOURCE: United States Environmental Protection Agency, 1971, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," NTID 300-1.

Temporary noise increases will be greatest during removal grading activities where tractors, backhoes, loaders, and graders can produce noise levels between 75 dBA and 95 dBA at 50 feet from the equipment source. Equipment utilized during building construction, paving, and architectural coating activities can produce noise levels up to 85 dBA at 50 feet from the equipment source. This can potentially result in impacts to nearby residential land use. However, there are no residential uses in the project vicinity. Therefore there will be no impact to

residential use as a result of construction of this project. Temporary construction noise has been estimated using the Federal Highway Administration's Roadway Construction Noise Model Version 1.1 (see Appendix H, Construction Noise Output). Because the three proposed buildings will be constructed consecutively, construction noise has been estimated for the construction of each individual building. During the construction of proposed Building A, the maximum noise levels from construction equipment are not expected to exceed 63.9 dBA as measured at nearby buildings. Noise levels are the highest at an industrial building located approximately 565 feet to the west of Building A, located at the northwest corner of Columbia Avenue and Michigan Avenue. During the construction of Building B, noise levels from construction equipment are not expected to exceed 64.1 dBA. Noise levels are the highest at an industrial building located approximately 556 feet to the east of Building B on Mt. Vernon. During the construction of Building C, noise levels from construction equipment are not expected to exceed 66.8 dBA. Noise levels are the highest at an industrial building located approximately 408 feet to the east of Building C, adjacent to the project site. The City of Riverside allows exterior noise levels to reach 70 dBA for industrial uses. The highest estimated construction noise levels for each of the three proposed buildings will not exceed the 70 dBA threshold. Therefore, temporary construction-related noise impacts will be less than significant.

e,f) **No Impact.** The proposed project is not located within two miles of a public or private airstrip or within an airport land use plan. No impacts will occur.

4.13 – Population and Housing

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☑	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☑

a) **Less Than Significant Impact.** The 2012 Regional Transportation Plan (RTP) growth projections are developed utilizing a comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans. Growth projections for the 2012 RTP predicted a citywide employment growth between 2008 and 2020 of approximately 45,800 and 66,300 by 2035. This project's estimated 3,172 employees represent approximately 6.9 percent and 4.8 percent of that citywide projection for 2020 and 2035 respectively. This project would accommodate additional local employment that is well within the growth forecasts developed for the RTP. Furthermore, the project does not include any infrastructure extension or expansion and therefore will not result in any indirect population growth. Impacts will be less than significant.

b) **No Impact.** The project site is vacant without any housing and does not require removal of any residential units, thus no impact will occur.

c) **No Impact.** Displacement, in the context of housing, can generally be defined as persons or groups of persons who have been forced or obliged to flee or to leave their homes or places of habitual residence.[46] There is no housing located onsite. As such, there is no *forced or obliged* removal of persons, and therefore no displacement. No impact will occur.

[46] The Brookings Institute. Handbook for Applying the Guiding Principles on Internal Displacement. 1999.

4.14 – Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☑	☐
b) Police protection?	☐	☐	☑	☐
c) Schools?	☐	☐	☑	☐
d) Parks?	☐	☐	☐	☑
e) Other public facilities?	☐	☐	☑	☐

a) Less Than Significant Impact. The City of Riverside Fire Department provides fire protection and emergency medical response services in the City of Riverside. The project site is primarily serviced by Station No. 6, located at 1077 Orange Street, approximately 2.4 miles west of the project site.

The project is a proposed development of a vacant site in a primarily industrial area. The project is located within the service area of the Riverside Fire Department, which has 14 stations. Therefore, the project would not have a significant impact on fire response times and would not otherwise create a substantially greater need for fire protection services than already exists that would necessitate construction of new facilities. No new or expanded fire protection facilities would be required as a result of this project. Furthermore, the proposed project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or modified fire protection equipment to meet potential emergency demand. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of fire protection services will be less than significant.

b) Less Than Significant Impact. The City of Riverside Police Department provides police protection services in the City of Riverside. The project site is served by the Orange Station located at 4102 Orange Street, approximately 4.5 miles southwest of the project site.

The proposed project will not result in any unique or more extensive crime problems that cannot be handled with the existing level of police resources. The proposed project is located within the Riverside Police Department service area. No new or expanded police facilities would need to be constructed as a result of this project. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of police protection services will be less than significant.

c) Less Than Significant Impact. The proposed industrial project will result in indirect incremental population growth and potential associated growth in students, within the Riverside Unified School District. In accordance with California Government Code and the Riverside Unified School District, a standard school facility impact fee will be paid to offset any incremental impacts of the proposed project. Impacts to the school facilities will be less than significant.

d) No Impact. The proposed industrial project will not result in direct population growth that would incrementally impact recreation facilities. Impacts to recreation facilities are further discussed in section 4.15. Any expansion or new construction of recreation facilities resulting from the proposed project would be subject to its own environmental review pursuant to CEQA. No impact will occur.

e) Less Than Significant Impact. The proposed industrial project will result in employment growth and indirectly in population growth that would incrementally impact other public services such as libraries or hospitals. Any incremental impact would be addressed through payment of property taxes that go to serve City and County public services. With the payment of development impact fees and property taxes, a less than significant impact will occur.

4.15 – Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☑
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☑	☐

a) **No Impact.** The proposed industrial project will not directly result in population growth that would impact recreation facilities. However, the addition of employees to the project vicinity would result in increased use of local park facilities. Pursuant to Riverside Municipal Code Chapters 16.60 (Local Park Development Fees) and 16.44 (Regional Parks and Reserve Parks Development Fee), a Local Park Development Fee and a Regional Park and Reserve Park Development Fee is imposed on the construction or placement of all nonresidential units and new dwelling units. Dedication of park land in lieu of payment of all or a portion of the Local Park Development Fee may be accepted by the City Council. Credits for Regional Park Fees can be requested with the donation of land adjoining a regional park or land that is situated in a planned regional park or reserve park as shown in the City's General Plan. With payment of the required Park Development Fees, dedication of land in lieu of payment, or donation of land to the regional park system, no impact will occur.

b) **Less Than Significant Impact.** The proposed project includes the completion of a segment of an adjacent public trail located to the east of the site. The previously graded trail will be re-graded and completed with fencing and landscaping. Upon completion of this segment, the trail will connect to the city and county trail network. The area of the trail and improvements is minimal and will not cause an adverse physical effect on the environment. Impacts will be less than significant.

4.16 – Transportation and Traffic

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☑	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☑	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☑
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☑	☐
e) Result in inadequate emergency access?	☐	☐	☑	☐

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☑	☐

a) **Less Than Significant Impact with Mitigation Incorporation.** Construction of the proposed project could reduce the performance of the circulation system if the project-related vehicle trips or any proposed improvements decrease the Level of Service (LOS) on existing streets. In addition, impacts could occur if project improvements reduce the performance of any mode of transportation including mass transit and non-motorized travel.

The project site has been designed to take direct access via four driveways on Palmyrita Avenue and one driveway on Michigan Avenue. Palmyrita Avenue is a four-lane undivided Arterial roadway that is aligned east to west. Michigan Avenue is a two-lane undivided Collector road aligned from north to south. Regional access to the project site is provided by I-215 freeway, SR-60 freeway, and SR-91 freeway.

A traffic analysis was prepared to assess project traffic and parking impacts (see Appendix I, Traffic Impact Analysis). [47] The traffic analysis evaluated potential project-related traffic impacts at the following 22 intersections:

- Primer Street at Interchange Street
- Primer Street at Columbia Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue
- Chicago Avenue/Paige Drive at Columbia Avenue
- SR-60 Freeway/I-215 Freeway SB Ramps at 3rd Street
- SR-60 Freeway/I-215 Freeway NB Ramps at 3rd Street/Blaine Street
- Iowa Avenue at I-215 Freeway SB Ramps
- Iowa Avenue at I-215 Freeway NB Ramps
- Iowa Avenue at Palmyrita Avenue
- Iowa Avenue at Columbia Avenue
- Iowa Avenue at Marlborough Avenue
- Iowa Avenue at Spruce Street
- Iowa Avenue at Massachusetts Avenue
- Iowa Avenue at Blaine Street
- Michigan Avenue at Palmyrita Avenue
- Michigan Avenue/Building A Driveway at Columbia Avenue (new intersection)
- Building A Driveway at Palmyrita Avenue (new intersection)
- Building B West Driveway at Palmyrita Avenue (new intersection)
- Building B East Driveway at Palmyrita Avenue (new intersection)
- Building C Driveway at Palmyrita Avenue (new intersection)

The traffic analysis presents existing traffic volumes, opening years (2015, 2016, and 2017), and future year (2035) traffic volumes without project and with project taking into account natural ambient traffic growth. In addition, truck classification counts were conducted at the intersections

[47] Kunzman Associates, Inc. Invesco Columbia Center Traffic Impact Analysis. May 30, 2014.

and the existing percent of trucks were used in the conversion to Passenger Car Equivalent's (PCE's).

Table 13 (Project Trip Generation) below details the trip generation for each building of the proposed development. The proposed project is anticipated to generate a total of 4,542 ADT, 239 AM peak hour trips, and 261 PM peak hour trips in passenger car equivalents.

Table 13
Proposed Trip Generation

Land Use	ADT	AM Peak	PM Peak
Building A	2,202	147	160
Building B	815	54	62
Building C	425	38	39
Total	**3,442**	**239**	**261**

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014

Traffic volumes and delay presented in the traffic study utilize Delay and Level of Service (LOS). Delay is measured utilizing the Intersection Delay Method based on the 2000 Highway Capacity Manual. This method calculates delay by comparing the volume of traffic using a given intersection to the capacity of a given intersection where when an intersections volume exceeds capacity resulting in a ratio equal to or exceeding 1.0 and a LOS of F. The traffic analysis also presents delay in terms of time (seconds) of delay experienced at a given intersection. LOS is defined on a scale of A through F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. LOS A is characterized as having free-flowing traffic conditions with no restrictions on maneuvering or operation speeds, where traffic volumes are low and travel speeds are high. LOS F is characterized as having forced flow with many stoppages and low operating speeds.

The City of Riverside allows peak hour intersection operations of LOS D to be used as a maximum acceptable threshold for study area intersections. A significant impact could occur when the addition of project generated trips causes either peak hour LOS to degrade from acceptable LOS (A through D) to unacceptable LOS (E or F) or peak hour delay to increase as follows:

Level of Service A/B = By 10.0 seconds
Level of Service C = By 8.0 seconds
Level of Service D = By 5.0 seconds
Level of Service E = By 2.0 seconds
Level of Service F = By 1.0 seconds

Table 14 (Existing Intersection Delay and Level of Service) identifies the existing intersection delays utilizing Delay and LOS for the 17 existing intersections.

Table 14
Existing Intersection Delay and Level of Service

Study Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
Primer Street at Interchange Street	56.8	F	99.9	F
Primer Street at Columbia Street	15.8	B	16.5	B
West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps	23.8	C	99.9	F
East La Cadena Drive at I-215 Freeway NB Ramps	99.9	F	99.9	F
East La Cadena Drive at Columbia Avenue	39.2	D	33.8	C
Chicago Avenue/Paige Drive at Columbia Avenue	23.6	C	22.7	C
SR-60 Freeway/I-215 Freeway SB Ramp at 3rd Street	28.0	C	27.4	C
SR-60 Freeway/I-215 Freeway NB Ramp at 3rd Street/Blaine Street	25.7	C	20.5	C
Iowa Avenue at I-215 Freeway SB Ramps	19.4	C	20.0	C
Iowa Avenue at I-215 Freeway NB Ramps	15.8	C	14.2	B
Iowa Avenue at Palmyrita Avenue	27.0	C	25.8	C
Iowa Avenue at Columbia Avenue	19.5	C	20.3	C
Iowa Avenue at Marlborough Avenue	16.6	B	21.3	C
Iowa Avenue at Spruce Street	26.3	C	26.1	C
Iowa Avenue at Massachusetts Avenue	26.1	C	13.5	B
Iowa Avenue at Blaine Street	28.8	C	29.5	C
Michigan Avenue at Palmyrita Avenue	9.7	A	12.6	B

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.
Notes:
- *Delay and level of service has been calculated using the following analysis software Traffic, Version 7.9.0215 (2008). Per the Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worse approach are shown.*
- *99.9 – F = Delay high, intersection unstable, Level of Service F*

Opening Year 2015 Intersection Delay
Table 15 (Opening Year (2015) With Project Building A Traffic Conditions) shows intersection delays and LOS under without Project and with Project Building A conditions. Under 2015 without project conditions, the study area intersections are projected to operate at acceptable LOS during peak hours, except for the following study area intersections without improvements:

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue

The delay and LOS for year 2015 with Project Building A conditions is shown on Table 15. As shown, the following study area intersections would operate at unacceptable LOS under Opening Year 2015 conditions without improvements.

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue

Opening Year 2016 Intersection Delay
Table 16 (Opening Year (2016) With Project Buildings A and B Traffic Conditions) shows intersection delays and LOS under without Project and with Project Buildings A and B conditions. Under 2016 without project conditions, the study area intersections are projected to operate at acceptable LOS during peak hours, except for the following study area intersections without improvements:

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue

The delay and LOS for year 2016 with Project Buildings A and B conditions is shown on Table 16. As shown, the following study area intersections would operate at unacceptable LOS under Opening Year 2016 conditions without improvements.

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue

Opening Year 2017 Intersection Delay
Table 17 (Opening Year (2017) With Project Buildings A, B, and C Traffic Conditions) shows intersection delays and LOS under without Project and with Project Buildings A, B, and C conditions. Under 2017 without project conditions, the study area intersections are projected to operate at acceptable LOS during peak hours, except for the following study area intersections without improvements:

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue

The delay and LOS for year 2017 with Project Buildings A, B, and C conditions is shown on Table 17. As shown, the following study area intersections would operate at unacceptable LOS under Opening Year 2017 conditions without improvements.

- Primer Street at Interchange Street
- West La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps
- East La Cadena Drive at I-215 Freeway NB Ramps
- East La Cadena Drive at Columbia Avenue
- SR-60 Freeway/I-215 Freeway NB Ramp at 3rd Street/Blaine Street

Year 2035 Intersection Delay
For year 2035 Without Project traffic conditions, the study area intersections are projected to operate at acceptable LOS during the peak hours, except for the following study area intersections that are projected to operate at unacceptable LOS during the peak hours, without improvements.

- Primer Street at Interchange Street
- I-215 Freeway SB Ramps at Columbia Avenue
- East La Cadena Drive at Columbia Avenue
- Chicago Avenue/Paige Drive at Columbia Avenue

- SR-60 Freeway/I-215 Freeway NB Ramp at 3rd Street/Blaine Street
- Iowa Avenue at I-215 Freeway SB Ramps
- Iowa Avenue at I-215 Freeway NB Ramps
- Iowa Avenue at Palmyrita Avenue
- Iowa Avenue at Spruce Street
- Iowa Avenue at Blaine Street

Table 18 (Year 2035 With Project Buildings A, B, and C Traffic Contributions) shows Year 2035 with and without Project Buildings A, B, and C delay and LOS. As shown, the following study area intersections would operate at unacceptable LOS under Year 2035 conditions without improvements.

- Primer Street at Interchange Street
- I-215 Freeway SB Ramps at Columbia Avenue
- East La Cadena Drive at Columbia Avenue
- Chicago Avenue/Paige Drive at Columbia Avenue
- SR-60 Freeway/I-215 Freeway NB Ramps at 3rd Street/Blaine Street
- Iowa Avenue at I-215 Freeway SB Ramps
- Iowa Avenue at I-215 Freeway NB Ramps
- Iowa Avenue at Palmyrita Avenue
- Iowa Avenue at Spruce Street
- Iowa Avenue at Blaine Street
- Michigan Avenue at Palmyrita Avenue

A summary of intersection improvements and costs are shown on Table 19 (Summary of Intersection Improvements). Year 2035 With Project Buildings A, B, and C fair share calculations are provided in Table 20 (Year 2035 With Project Buildings A, B, and C Fair Share Traffic Calculations). As shown in Table 20, the project's fair share of identified intersection costs is $60,120. Implementation of Traffic Study recommendations as Mitigation Measures will reduce Project impacts to less than significant levels.

Table 15
Opening Year (2015) With Project Building A Traffic Contribution

Intersection	Peak Hour	Opening Year (2015) Without Project		Opening Year (2015) With Project Building A							
				Without Mitigation				With Mitigation			
		Delay	LOS	Delay	LOS	Project Impact	Significant Impact	Delay	LOS	Project Impact	Significant Impact
Primer Street at Interchange Street	AM	69.8	F	83.3	F	13.5	Yes	10.5	B	-59.3	No
	PM	138.8	F	158.8	F	20.0	Yes	12.1	B	-126.7	No
Primer Street at Columbia Street	AM	16.2	B	16.4	B	0.2	No				
	PM	17.0	B	17.1	B	0.1	No				
W La Cadena Drive at Interchange Street/I-215 SB Ramps	AM	27.9	D	31.9	D	4.0	No	9.5	A	-18.4	No
	PM	164.8	F	179.5	F	14.7	Yes	15.9	B	-148.9	No
E La Cadena Drive at I-215 NB Ramps	AM	823.7	F	867.6	F	43.9	Yes	17.1	B	-806.6	No
	PM	815.1	F	928.8	F	113.7	Yes	21.4	C	-793.7	No
E La Cadena Drive at Columbia Avenue	AM	42.9	D	46.1	D	3.2	No	29.0	C	-13.9	No
	PM	36.6	D	39.0	D	2.4	No	27.5	C	-9.1	No
Chicago Avenue/Paige Drive at Columbia Avenue	AM	24.3	C	24.6	C	0.3	No				
	PM	23.1	C	23.3	C	0.2	No				
SR-60/I-215 SB Ramp at 3rd Street	AM	30.6	C	31.2	C	0.6	No				
	PM	30.2	C	31.5	C	1.3	No				
SR-60/I-215 NB Ramp at 3rd Street/Blaine Street	AM	28.8	C	30.3	C	1.5	No				
	PM	22.0	C	22.9	C	0.9	No				
Iowa Avenue at I-215 SB Ramps	AM	21.1	C	21.5	C	0.4	No				
	PM	22.1	C	22.1	C	0.0	No				
Iowa Avenue at I-215 NB Ramps	AM	16.6	C	16.7	C	0.1	No				
	PM	14.7	B	14.8	B	0.1	No				
Iowa Avenue at Palmyrita Avenue	AM	27.8	C	27.9	C	0.1	No				
	PM	26.4	C	26.5	C	0.1	No				
Iowa Avenue at Columbia Avenue	AM	19.8	B	20.7	C	0.9	No				
	PM	20.8	C	21.6	C	0.8	No				
Iowa Avenue at Marlborough Avenue	AM	19.8	B	19.9	B	0.1	No				
	PM	21.7	C	21.8	C	0.1	No				
Iowa Avenue at Spruce Street	AM	27.7	C	27.7	C	0.0	No				
	PM	27.2	C	27.5	C	0.3	No				
Iowa Avenue at Massachusetts Avenue	AM	28.7	C	29.7	C	0.7	No				
	PM	13.7	B	13.7	B	0.0	No				
Iowa Avenue at Blaine Street	AM	30.2	C	31.5	C	1.3	No				
	PM	31.1	C	32.9	C	1.8	No				
Michigan Avenue at Palmyrita Avenue	AM	9.8	A	10.0	B	0.2	No				
	PM	12.9	B	14.5	C	1.6	No				

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

Table 16
Opening Year (2016) With Project Buildings A and B Traffic Contribution

Intersection	Peak Hour	Opening Year (2016) Without Project		Opening Year (2016) With Project Buildings A and B							
				Without Mitigation				With Mitigation			
		Delay	LOS	Delay	LOS	Project Impact	Significant Impact	Delay	LOS	Project Impact	Significant Impact
Primer Street at Interchange Street	AM	78.1	F	99.9	F	21.8	Yes	10.6	B	-67.5	No
	PM	162.3	F	193.3	F	31.0	Yes	12.5	B	-149.8	No
Primer Street at Columbia Street	AM	16.4	B	16.7	B	0.3	No				
	PM	18.8	B	18.9	B	0.1	No				
W La Cadena Drive at Interchange Street/I-215 SB Ramps	AM	30.4	D	37.0	E	6.6	Yes	9.5	A	-20.9	No
	PM	174.8	F	195.6	F	20.8	Yes	16.9	B	-157.9	No
E La Cadena Drive at I-215 NB Ramps	AM	920.8	F	981.0	F	60.2	Yes	17.6	B	-903.2	No
	PM	925.5	F	1092.2	F	166.7	Yes	22.4	C	-903.1	No
E La Cadena Drive at Columbia Avenue	AM	44.7	D	49.5	D	4.8	No	30.5	C	-14.2	No
	PM	38.1	D	41.5	D	3.4	No	28.6	C	-9.5	No
Chicago Avenue/Paige Drive at Columbia Avenue	AM	24.5	C	25.1	C	0.6	No				
	PM	23.3	C	23.7	C	0.4	No				
SR-60/I-215 SB Ramp at 3rd Street	AM	32.0	C	33.1	C	1.1	No				
	PM	31.8	C	33.7	C	1.9	No				
SR-60/I-215 NB Ramp at 3rd Street/Blaine Street	AM	30.3	C	33.2	C	2.9	No				
	PM	22.7	C	24.3	C	1.6	No				
Iowa Avenue at I-215 SB Ramps	AM	22.0	C	22.7	C	0.7	No				
	PM	23.5	C	23.4	C	-0.1	No				
Iowa Avenue at I-215 NB Ramps	AM	17.0	C	17.2	C	0.2	No				
	PM	15.0	C	15.1	C	0.1	No				
Iowa Avenue at Palmyrita Avenue	AM	28.3	C	28.5	C	0.2	No				
	PM	26.8	C	26.9	C	0.1	No				
Iowa Avenue at Columbia Avenue	AM	19.9	C	21.4	C	1.5	No				
	PM	22.2	C	22.2	C	0.0	No				
Iowa Avenue at Marlborough Avenue	AM	20.0	B	20.1	C	0.1	No				
	PM	21.9	C	22.0	C	0.1	No				
Iowa Avenue at Spruce Street	AM	28.0	C	29.1	C	1.1	No				
	PM	27.7	C	28.2	C	0.5	No				
Iowa Avenue at Massachusetts Avenue	AM	30.2	C	31.6	C	1.4	No				
	PM	14.0	B	14.0	B	0.0	No				
Iowa Avenue at Blaine Street	AM	31.0	C	32.8	C	1.8	No				
	PM	32.0	C	35.0	D	3.0	No				
Michigan Avenue at Palmyrita Avenue	AM	9.8	A	10.3	B	0.5	No				
	PM	13.0	B	16.5	C	3.5	No				

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

Table 17
Opening Year (2017) With Project Buildings A, B, and C Traffic Contribution

Intersection	Peak Hour	Opening Year (2017) Without Project		Opening Year (2017) With Project Buildings A, B, and C							
				Without Mitigation				With Mitigation			
		Delay	LOS	Delay	LOS	Project Impact	Significant Impact	Delay	LOS	Project Impact	Significant Impact
Primer Street at Interchange Street	AM	88.0	F	118.7	F	30.7	Yes	10.7	B	-77.3	No
	PM	189.8	F	228.5	F	38.7	Yes	12.8	B	-177.0	No
Primer Street at Columbia Street	AM	16.6	B	17.0	B	0.4	No				
	PM	19.0	B	19.2	B	0.2	No				
W La Cadena Drive at Interchange Street/I-215 SB Ramps	AM	33.4	D	42.4	E	9.0	Yes	9.6	A	-23.8	No
	PM	184.9	F	209.4	F	24.5	Yes	17.9	B	-167.0	No
E La Cadena Drive at I-215 NB Ramps	AM	1026.1	F	1098.2	F	72.1	Yes	18.2	B	-1007.9	No
	PM	1047.5	F	1263.1	F	215.6	Yes	23.4	C	-1024.1	No
E La Cadena Drive at Columbia Avenue	AM	46.8	D	52.6	D	5.8	Yes	31.9	C	-14.9	No
	PM	39.8	D	43.8	D	4.0	No	29.7	C	-10.1	No
Chicago Avenue/Paige Drive at Columbia Avenue	AM	24.7	C	25.5	C	0.8	No				
	PM	23.6	C	24.0	C	0.4	No				
SR-60/I-215 SB Ramp at 3rd Street	AM	33.6	C	35.2	D	1.6	No				
	PM	33.5	C	35.8	B	2.3	No				
SR-60/I-215 NB Ramp at 3rd Street/Blaine Street	AM	32.2	C	35.8	D	3.6	No	22.2	C	-10.0	No
	PM	23.6	C	25.6	B	2.0	No	18.0	B	-5.6	No
Iowa Avenue at I-215 SB Ramps	AM	23.1	C	24.1	C	1.0	No				
	PM	25.0	D	24.9	C	-0.1	No				
Iowa Avenue at I-215 NB Ramps	AM	17.5	C	17.8	C	0.3	No				
	PM	15.3	C	15.4	C	0.1	No				
Iowa Avenue at Palmyrita Avenue	AM	28.8	C	29.1	C	0.3	No				
	PM	27.2	C	27.3	C	0.1	No				
Iowa Avenue at Columbia Avenue	AM	20.1	C	21.2	C	1.1	No				
	PM	22.3	C	22.8	C	0.5	No				
Iowa Avenue at Marlborough Avenue	AM	20.2	C	20.2	C	0.0	No				
	PM	22.1	C	22.3	C	0.2	No				
Iowa Avenue at Spruce Street	AM	28.7	C	29.3	C	0.6	No				
	PM	28.3	C	29.0	C	0.7	No				
Iowa Avenue at Massachusetts Avenue	AM	32.0	C	34.0	C	2.0	No				
	PM	14.1	B	14.2	B	0.1	No				
Iowa Avenue at Blaine Street	AM	31.9	C	34.2	C	2.3	No				
	PM	33.1	C	36.8	D	3.7	No				
Michigan Avenue at Palmyrita Avenue	AM	9.8	A	10.5	B	0.7	No				
	PM	13.2	B	18.3	C	5.1	No				

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

Table 18
Year 2035 With Project Buildings A, B, and C Traffic Contribution

Intersection	Peak Hour	Opening Year (2035) Without Project		Opening Year (2035) With Project Buildings A, B, and C							
				Without Mitigation				With Mitigation			
		Delay	LOS	Delay	LOS	Project Impact	Significant Impact	Delay	LOS	Project Impact	Significant Impact
Primer Street at Interchange Street	AM	51.4	F	51.4	F	0.0	No	10.7	B	-40.7	No
	PM	46.6	E	46.6	E	0.0	No	10.6	B	-36.0	No
Primer Street at Columbia Street	AM	16.9	B	16.9	B	0.0	No				
	PM	36.9	C	36.9	D	0.0	No				
I-215 Freeway SB Ramps at Columbia Avenue	AM	24.8	C	16.6	B	-8.2	No				
	PM	47.6	D	19.8	B	-27.8	No				
I-215 Freeway NB Ramps at Columbia Avenue	AM	14.2	B	15.2	B	1.0	No				
	PM	19.1	B	20.3	C	1.2	No				
E La Cadena Drive at Columbia Avenue	AM	34.8	C	35.0	C	0.2	No	29.3	C	-5.5	No
	PM	55.8	E	58.6	E	2.8	Yes	38.4	D	-17.4	No
Chicago Avenue/Paige Drive at Columbia Avenue	AM	91.0	F	103.5	F	12.5	Yes	44.0	D	-47.0	No
	PM	137.8	F	141.4	F	3.6	Yes	54.4	D	-83.4	No
SR-60/I-215 SB Ramp at 3rd Street	AM	40.0	D	38.2	D	-1.8	No				
	PM	42.0	D	45.2	D	3.2	No				
SR-60/I-215 NB Ramp at 3rd Street/Blaine Street	AM	58.1	E	63.3	E	5.2	Yes	35.0	C	-23.1	No
	PM	71.7	E	79.1	E	7.4	Yes	37.8	D	-33.9	No
Iowa Avenue at I-215 SB Ramps	AM	154.7	F	154.1	F	-0.6	No	14.9	B	-139.8	No
	PM	365.4	F	360.5	F	-4.9	No	14.6	B	-350.8	No
Iowa Avenue at I-215 NB Ramps	AM	36.9	E	38.1	E	1.2	No	13.2	B	-23.7	No
	PM	259.7	F	264.5	F	4.8	Yes	33.8	C	-225.9	No
Iowa Avenue at Palmyrita Avenue	AM	120.7	F	125.7	F	5.0	Yes	54.4	D	-70.3	No
	PM	126.5	F	130.9	F	4.4	Yes	53.4	D	-73.1	No
Iowa Avenue at Columbia Avenue	AM	41.0	D	36.4	D	-4.6	No				
	PM	45.6	D	49.9	D	4.3	No				
Iowa Avenue at Marlborough Avenue	AM	35.0	C	35.0	C	0.0	No				
	PM	38.9	D	39.7	D	0.8	No				
Iowa Avenue at Spruce Street	AM	62.7	E	63.6	E	0.9	No	37.9	D	-24.8	No
	PM	101.3	F	102.8	F	1.5	Yes	48.4	D	-52.9	No
Iowa Avenue at Massachusetts Avenue	AM	31.7	C	27.8	C	-3.9	No				
	PM	32.7	C	34.0	C	1.3	No				
Iowa Avenue at Blaine Street	AM	53.9	D	579	E	4.0	No	32.1	C	-21.8	No
	PM	65.9	E	73.6	E	7.7	Yes	35.6	D	-30.3	No
Michigan Avenue at Palmyrita Avenue	AM	14.0	B	15.3	C	1.3	No	19.6	B	5.6	No
	PM	33.8	D	58.2	F	24.4	Yes	19.0	B	-14.8	No

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

Table 19
Summary of Intersection Improvements

Intersection	Improvement	Note	Cost
Primer Street at Interchange Street	Install a traffic signal [1, 2, 3]	Proposed new interchange	TUMF
W La Cadena Drive at Interchange Street/I-215 Freeway SB Ramps	Construct a northbound left turn lane[1, 2, 3] Construct a southbound left turn lane [1, 2, 3] Construct a westbound left turn lane[1, 2, 3] Construct an additional westbound left turn lane[4] Install a traffic signal[1, 2, 3]	Proposed new interchange Proposed new interchange Proposed new interchange Proposed new interchange Proposed new interchange	TUMF TUMF TUMF TUMF TUMF
E La Cadena Drive at I-215 Freeway NB Ramps	Install a traffic signal[1, 2, 3]	Proposed new interchange	TUMF
E La Cadena Drive at Columbia Avenue	Install a westbound right turn overlap[1, 2, 3, 4]	Pay fair share	$10,000
Chicago Avenue/Paige Drive at Columbia Avenue	Construct a northbound right turn lane[4] Construct an additional southbound left turn lane[4]	Pay fair share Pay fair share	$50,000 $50,000
SR-60 Freeway/I-215 Freeway NB Ramps at 3rd Street/Blaine Street	Construct a westbound right turn lane[4]	Pay fair share	$50,000
Iowa Avenue at I-215 Freeway SB Ramps	Construct an additional northbound through lane[4] Construct an additional southbound through lane[4] Install a traffic signal[4]	Proposed new interchange Proposed new interchange Proposed new interchange	TUMF TUMF TUMF
Iowa Avenue at I-215 Freeway NB Ramps	Construct an additional northbound through lane[4] Construct a southbound left turn lane[4] Construct an additional southbound through lane[4] Install a traffic signal[4]	Proposed new interchange Proposed new interchange Proposed new interchange Proposed new interchange	TUMF TUMF TUMF TUMF
Iowa Avenue at Palmyrita Avenue	Install a northbound right turn overlap[4] Construct an additional westbound left turn lane[4] Install a westbound right turn overlap[4]	Pay fair share Pay fair share Pay fair share	$10,000 $50,000 $10,000
Iowa Avenue at Spruce Avenue	Construct an additional northbound left turn lane[4] Construct an additional southbound left turn lane[4] Construct an eastbound right turn lane[4] Construct a westbound right turn lane[4] Construct a westbound right turn overlap[4]	Pay fair share Pay fair share Pay fair share Pay fair share Pay fair share	$50,000 $50,000 $50,000 $50,000 $10,000
Iowa Avenue at Blaine Street	Construct an additional northbound left turn lane[4] Install a southbound right turn overlap[4]	Pay fair share Pay fair share	$50,000 $10,000
Michigan Avenue at Palmyrita Avenue	Stripe a northbound left turn lane[4] Stripe a southbound left turn lane[4] Install a traffic signal[4]	Pay fair share Pay fair share Pay fair share	$10,000 $10,000 $250,000
		Total	**$770,000**

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

[1] *Improvement required for Opening Year (2015) with Project Building A*
[2] *Improvement required for Opening Year (2016) with Project Buildings A and B*
[3] *Improvement required for Opening Year (2017) with Project Buildings A, B, and C*
[4] *Improvement required for Year 2035 with Project Buildings A, B, and C*

Table 20
Year 2035 With Project Buildings A, B, and C Fair Share Traffic Calculations

Intersection	Year 2035 Improvement Costs[1]	Existing		Year 2035 With Project		Project		Total New Traffic		Project % of New Traffic			Fair Share Cost
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM	AVG	
E La Cadena Drive at Columbia Avenue	$10,000	2,672	2,808	4,207	4,745	114	124	1,535	1,937	7.4%	6.4%	6.9%	$690
Chicago Ave/Paige Dr at Columbia Ave	$100,000	2,215	2,377	5,047	5,713	114	124	2,832	3,336	4.0%	3.7%	3.9%	$3,850
SR-60 Freeway/I-215 Freeway NB Ramp at 3rd St/Blaine St	$50,000	2,727	2,495	3,600	3,536	67	73	873	1,041	7.7%	7.0%	7.4%	$3,675
Iowa Ave at Palmyrita Ave	$70,000	1,751	2,050	4,118	4,920	43	47	2,367	2,870	1.8%	1.6%	1.7%	$1,190
Iowa Ave at Spruce Avenue	$210,000	2,495	2,613	4,354	5,318	67	74	1,859	2,705	3.6%	2.7%	3.2%	$6,615
Iowa Ave at Blaine St	$60,000	3,054	3,363	4,547	5,059	67	74	1,493	1,696	4.5%	4.4%	4.5%	$2,670
Michigan Avenue at Palmyrita Avenue	$270,000	304	495	1,363	1,520	155	170	1,059	1,025	14.6%	16.6%	15.6%	$42,120
Total	**$770,000**												**$60,120**

Source: Kunzman Associates, Inc. Columbia Business Center Traffic Impact Analysis. November 18, 2014.

[1] *This total is for Year 2035 With Project Buildings A, B, and C improvements.*

Additional recommendations include the following:

- Sufficient on-site parking should be provided to meet City of Riverside parking code requirements.
- Sight distance at the project accesses should be reviewed with respect to California Department of Transportation/City of Riverside standards in conjunction with the preparation of final grading, landscaping, and street improvement plans.
- On-site traffic signing and striping should be implemented in conjunction with detailed construction plans for the project.

The City's General Plan designates a Primary Trail adjacent to the project site to the east. This trail is currently unimproved. Plans for improving the trail have not been finalized. Riverside Transit provides local transit service in the area. No existing routes are located adjacent to the project site. The closest bus stop to the project site is located at the intersection of Iowa Avenue and Columbia Avenue, approximately one mile west of the project site. Riverside Transit Route runs south to the Galleria at Tyler from Spruce and Atlanta. Route 14 runs south to the Galleria at Tyler from the VA Hospital located in the City of Loma Linda, stopping along Iowa Avenue. Transfers to other transit lines can be made along Riverside Transit Routes 13 and 14. The project provides adequate pedestrian access along the project frontage and onto the project site. The project will therefore not conflict with any non-motorized or transit plans, resulting in a less than significant impact.

Mitigation Measure TR-1
Prior to issuance to building permits, fair share payment shall be made for the following improvements:

- Pay fair share of the installation of a westbound right turn overlap at the intersection of East La Cadena Drive at Columbia Avenue.

- At the intersection of Chicago Avenue/Paige Drive and Columbia Avenue, pay fair share of the following improvements:
  - Construct a northbound right turn lane
  - Construct an additional southbound left turn lane

- Pay fair share of the construction of a westbound right turn lane at the intersection of SR-60/I-215 Freeway northbound ramps and 3rd Street/Blaine Street.

- At the intersection of Iowa Avenue and Palmyrita Avenue, pay fair share of the following improvements:
  - Install a northbound right turn overlap
  - Construct an additional westbound left turn lane
  - Install a westbound right turn overlap

- At the intersection of Iowa Avenue and Spruce Avenue, pay fair share of the following improvements:
  - Construct an additional northbound left turn lane
  - Construct an additional southbound left turn lane
  - Construct an eastbound right turn lane
  - Construct a westbound right turn lane
  - Construct a westbound right turn overlap

- At the intersection of Iowa Avenue at Blaine Street, pay fair share of the following improvements:

  - Construct an additional northbound left turn lane
  - Install a southbound right turn overlap

- At the intersection of Michigan Avenue at Palmyrita Avenue, pay fair share of the following improvements:
  - Stripe northbound left turn lane
  - Stripe southbound left turn lane
  - Install a traffic signal

b) **Less Than Significant Impact.** The proposed project could result in significant impacts if it conflicts with the Riverside County Congestion Management Program (CMP) through reducing the Level of Service of a non-exempt segment to fall to "F". If LOS for a non-exempt segment is reduced to "F", a deficiency plan outlining specific mitigation measure and a schedule for mitigating the deficiency will be required. The nearest affected CMP designated freeways are I-215, SR-60, and SR-91 and the nearest arterial link is Main Street. The project traffic study indicated that the project would not reduce the Levels of Service on non-exempt roadways/highways as defined by the County's CMP. In addition, as is indicated previously in section 4.16 a, the project would not result in any intersection operating at LOS E or below with the proposed improvements; therefore a less than significant impact to the CMP will occur.

c) **No Impact.** The proposed project is not located within two miles of an airport or private air strip. The proposed building would not encroach into air traffic space and this project would have no effects on demand for local air service or volumes of air traffic. The proposed project will not alter air traffic patterns, therefore no impact will occur.

d) **Less Than Significant Impact.** If the project will substantially increase hazards due to a design feature, a significant impact could occur. No existing traffic hazards are known to exist in the immediate vicinity of the project. Roadways and intersections provide sufficient sight distance to limit the potential of any hazards and stop signs and traffic signals are placed at intersections to safely control traffic movements. The project traffic study included in its recommendation that sight distance at each project access should be reviewed with respect to California Department of Transportation/City of Riverside standards in conjunction with the preparation of final grading, landscaping, and street improvement plans. Impacts from the project will be less than significant to any potentially existing or future traffic hazard.

e) **Less Than Significant Impact.** The proposed project will be accessible via four 40-foot wide driveways on Palmyrita Avenue and one 60-foot wide driveway on Michigan Avenue. The project site plan identifies the 26-foot wide fire department access and turning radii entering the site and within the site, which are adequate to serve the site in case of an emergency. Therefore, the project will have less than significant impacts on the provision of adequate emergency access.

f) **Less Than Significant Impact.** The project will not result in conflicts with adopted policies or plans related to alternative modes of travel, such as bus transit, bicycles or walking paths. The project is not located adjacent to or near an existing bike path or pedestrian facilities it could conflict with, nor does the City have adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities that apply to the proposed project site. There is an unimproved park trail located along the eastern boundary of the project site. Plans to improve the trail have not been finalized. Therefore, a less than significant impact will occur.

4.17 – Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☑	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☑	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☑
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☑	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☑	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☑	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☑

a) **Less Than Significant Impact.** The proposed project could affect Regional Water Quality Control Board treatment standards by increasing wastewater production, which would require expansion of existing facilities or construction of new facilities. Exceeding the RWQCB treatment

standards could result in contamination of surface or ground waters with pollutants such as pathogens and nitrates.

The City of Riverside Public Works Department provides sewer service to the project area.[48] The City of Riverside Public Works Department provides for the collection, treatment and disposal of wastewater at the project site through its Riverside Regional Water Quality Treatment Plant (RRWQCP) and complies with state and federal requirements governing the treatment and discharge of wastewater. The wastewater collection system includes over 776 miles of gravity sewers that range in size from six to 54 inches in diameter and includes 18 wastewater pump stations. According to the City of Riverside 2010 Urban Water Management Plan, RRWQCP treats approximately 34 million gallons per day (MGD). The capacity of the plan is 40 MGD. Upgrades to the plant are being designed to increase the capacity to 46 MGD by 2015. With improved treatment processes being added, the ultimate plant capacity is anticipated to be 52 MGD.[49] Final plant expansion is anticipated to occur in 2026. Sewer connection fees will be determined as outlined under Section 14.08.080 of the City's Municipal Code. Wastewater flows associated with the proposed Project would consist of the same kinds of substances typically generated by industrial use and no modifications to any existing wastewater treatment systems or construction of any new ones would be needed to treat this project's wastewater. Estimated wastewater generated by the proposed industrial development is approximately 17,347 gallons per day (gpd) (wastewater is estimated to be 80 percent of total water use). This volume represents 0.04 percent of the RRWQCP's current 40 mgd total treatment capacity. This project would thus have a less-than-significant impact on the ability of the RRWQCP to operate within its established wastewater treatment requirements, which are enforced via the facility's NPDES permit authorized by the Santa Ana Regional Water Quality Control Board (SARWQCB). Therefore, the project will have a less than significant impact related to wastewater treatment requirements of the SARWQCB.

b) **Less Than Significant Impact.** The City of Riverside's water supply is primarily groundwater, extracted by production wells from the Bunker Hill Basin, Riverside North, and Riverside South. Additional sources of water include groundwater from the Rialto-Colton Basin, recycled water from the City of Riverside's Regional Water Quality Control Plant (RWQCP), and imported water from WMWD through a connection at the Metropolitan Water District of Southern California's Henry J. Mills Treatment Plant. The Riverside Public Utilities Department provides water service to the project area, and will provide water service to the proposed project upon completion of financial arrangements and compliance with the Department's Rules and Regulations for the installation of water facilities.[50] Sections 10910-10915 of the state Water Code require the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for any subdivision that involves the construction of more than 500 dwelling units, or the equivalent thereof. As the project is below the established thresholds, no WSA is required.[51] The Riverside Public Utilities Department (RPU) projects adequate water supplies for the project based upon current water supply and projected growth rates, estimated between 2015 and 2035.[52] The 2010 water usage in the RPU service area was approximately 83,300 AFY and is expected to increase steadily through to 2035. The proposed water use in 2035 is estimated to be 119,800 AFY, an increase of 36,500 AFY. Groundwater supplies will be augmented through three conjunctive use projects: Seven Oaks Dam Conservation Project, Riverside North Aquifer Storage

48 Correspondence with Robert Van Zanten, Principal Engineer, City of Riverside Public Works Department. January 30, 2013.
49 City of Riverside Public Utilities. Final 2010 Urban Water Management Plan. July 2011.
50 Correspondence with Toni Redman, Senior Engineering Aide, City of Riverside. March 11, 2013.
51 Correspondence with Michael L. Plinski, P.E., Senior Water Engineer, Riverside Public Utilities. November 26, 2013.
52 City of Riverside Public Utilities. Final 2010 Urban Water Management Plan. July 2011.

and Recovery Project, and Pellisier Ranch Aquifer Storage and Recovery Project, and through increased use of recycled water. Total available water (including groundwater, conjunctive use projects, recycled water, and imported water from MWD) to the Riverside Public Utilities service area is estimated to reach 143,226 AFY by 2035, which is more than sufficient to meet the estimated 2035 water demand. Based on CalEEMod assumptions, the proposed project's estimated water demand is approximately 24.3 AFY, representing 0.07 percent of the remaining projected use. The proposed project is designed to support typical warehouse and distribution uses. Should a heavy utility use be proposed as a tenant, further review and approval will be required through the City.

Regarding wastewater facilities, as discussed in the preceding response, wastewater generated at the project site is treated at the Riverside Regional Water Quality Treatment Plant (RRWQCP). The proposed project is estimated to have a wastewater generation of approximately 17,347 gpd. This generation is well within the existing remaining treatment capacity of the RRWQCP, comprising 0.04 percent of the current 40 million gpd treatment capacity.

Connections to local water and sewer mains would involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements. No additional improvements are needed to either sewer lines or treatment facilities to serve the proposed project. Standard connection fees will address any incremental impacts of the proposed project. Therefore, the project will result in less than significant impacts as a result of new or expanded wastewater treatment facilities.

c) **No Impact.** Potentially significant impacts could occur as a result of this project if storm water runoff was increased to a level that would require construction of new storm drainage facilities. As discussed in the Hydrology section, the proposed project would not generate any increased runoff from the site that would require construction of new storm drainage facilities. The City's NPDES permit requires most new development projects to incorporate best management practices to minimize pollutant levels in runoff. Pursuant to Riverside Municipal Code Chapter 14.12 (Discharge of Wastes into Public Sewer and Storm Drain Systems), all construction projects shall apply Best Management Practices (BMPs) such as sediment barriers, plastic sheeting, detention ponds, filters and berms to prevent erosion. Implementation of BMPs would reduce pollutants in stormwater and urban runoff from the project site. The proposed storm drainage system and BMPs must be designed to the satisfaction of the City's Public Works Director and in conformance with all applicable permits and regulations. The project applicant/developer would be required to provide all necessary on-site infrastructure. The project will have a less than significant impact on requiring the construction of new facilities or expansion of existing storm drainage facilities.

d) **Less Than Significant Impact.** The project could result in significant impacts if the project required additional water supplies than are currently entitled. Water demand is provided by survey data utilized in the CalEEMod air quality model. Water demand is estimated at 7,914,557 gallons per year or 24.3 acre feet per year. Water demand within the Riverside Public Utilities service area is projected to be 119,800 AFY by 2035. The proposed project's estimated water demand is approximately 24.3 AFY, representing 0.07 percent of the remaining projected use. Based on the City of Riverside 2010 Urban Water Management Plan (UWMP), the City's service area is approximately 80 percent built out with approximately 15 percent vacant land available for development. The Bunker Hill Basin is managed to maintain adequate future water supplies through future conjunctive use projects, increased use of recycled water, and water imported from MWD. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

e) **Less Than Significant Impact.** As detailed in Sections 4.17.a) and 4.17.b), the proposed project will be adequately served by existing facilities. Therefore a less than significant impact will occur.

f) **Less Than Significant Impact.** Significant impacts could occur if the proposed project will exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. The City of Riverside Public Works Department collects trash from 70 percent of all households. The remaining portions of the City's solid waste are serviced by private collectors.[53] Regional landfill capacity fluctuates daily and is regularly monitored by the County Sanitation Districts of Riverside County to ensure there is sufficient landfill space available to dispose of municipal solid wastes throughout the region. This project's additional solid waste stream would have a less than significant impact on regional landfill capacity. Cities must meet the 50% landfill diversion mandate required by State law. General Plan Policy PF-5.1 states that waste should be diverted from landfills and states that the City should achieve 100% recycling citywide for both residential and non-residential development. In 2012, the per employee disposal rate was 13.7 pounds per day, below the target of no more than 19.5 pounds per day and less than waste in 2011 (13.9 pounds per day).[54] According to the California Department of Resources Recycling and Recovery (CalRecycle), the City disposes of waste at several area landfills, including:

- Badlands Sanitary Landfill
- El Sobrante Landfill
- Puente Hills Landfill (Closed 2013)
- Olinda Alpha Sanitary Landfill
- San Timoteo Sanitary Landfill
- Simi Valley Landfill & Recycling Center
- California Street Landfill
- Mid-Valley Sanitary Landfill
- Azusa Land Reclamation Co. Landfill
- Chiquita Canyon Sanitary Landfill
- Antelope Valley Public Landfill
- American Avenue Disposal Site
- McKittrick Waste Treatment Site

The majority of waste in 2012 went to the Badlands Sanitary Landfill and the El Sobrante Landfill.[55] The Badlands Sanitary Landfill, located in Moreno Valley, has a permitted daily capacity of 4,000 tons, with a permitted total capacity of 33,560,993 cubic yards and a remaining capacity of 14,730,025 cubic yards. This landfill is projected to close in 2024.[56] The El Sobrante Landfill, located in Corona, has a permitted daily capacity of 16,054 tons per day and a total capacity of 184,930,000 tons, with a remaining capacity of 145,530,000 tons. This landfill is estimated to close in 2045.[57] Although these existing landfills currently used by Riverside are anticipated to close in 2024 and 2045, other regional landfills have remaining capacity. Also, regional plans are underway to transport waste by rail to landfill sites in the desert areas to the east.

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53 Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

54 CalRecycle. Facility/Site Summary Details, Jurisdiction Diversion/Disposal Rate Summary. http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx [December 2013]

55 CalRecycle. Jurisdiction Disposal by Facility. http://www.calrecycle.ca.gov/LGCentral/Reports/DRS/Destination/JurDspFa.aspx [December 2013]

56 CalRecycle. Facility/Site Summary Details: Badlands Sanitary Landfill (33-AA-0006) http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0006/Detail/ [December 2013]

57 CalRecycle. Facility/Site Summary Details: El Sobrante Landfill (33-AA-0217) http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0217/Detail/ [December 2013]

Different uses have varying levels of estimated solid waste production. Using the default calculations in the CalEEMod model, the proposed Project will generate approximately 644 tons of solid waste per year. There is adequate landfill capacity in the region to accommodate project-generated waste. Considering the availability of landfill capacity and the relatively nominal amount of solid waste generation from the proposed project, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest and optional, more distant, landfills. Therefore, it is not expected that the proposed project would impact the City's compliance with state-mandated (AB 939) waste diversion requirements. Impacts will be less than significant.

g) **No Impact.** The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact will occur.

4.18 – Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☑	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of the past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☑	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☑	☐	☐

a) **Less Than Significant with Mitigation Incorporation.** The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1. To ensure that the proposed project would not result in significant light and glare impacts, Mitigation Measure AVQ-1 has been incorporated. The proposed project would not significantly impact any sensitive plants, plant communities, fish, or wildlife, as discussed in Section 4.4. Mitigation Measures BIO-1 has been incorporated to ensure that impacts to potential burrowing owls would remain less than significant. Adverse impacts to historic resources would not occur. Construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading, consistent with Mitigation Measures C-1 and C-2. This site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section 4.2 concludes that impacts related to emissions of criteria pollutants and other air quality

impacts will be less than significant. Section 4.7 concludes that impacts related to climate change would be less then significant with incorporation of Mitigation Measure GHG-1. Sections 4.9 concludes that impacts related to hydrology and water quality will be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 thru 4.17, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporation.

b) **Less Than Significant with Mitigation Incorporation.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements, air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project.

Non-Cumulative Impacts
Impacts related to aesthetics, geology and soils, and airport hazards at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to these topics will occur.

Local Impacts
Projects can contribute considerably to cumulative impacts in context of the local environment. Local cumulative impacts are limited to agricultural and forestry resources, air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the local context is summarized below.

The analysis provided in Section 4.11 found that no individual impacts would occur; therefore, the project could not contribute considerably to local mineral resources impacts. The analysis provided in Section 4 related to agriculture and forest resources, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to localized cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, biological resources, cultural resources, greenhouse gas emissions, and transportation and traffic were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to significant localized cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The context for assessing cumulative air quality impacts is the immediate project vicinity with respects to emissions generated by the construction and operation of the proposed project. As mentioned in Section 4.3, use of low-VOC coatings during construction activities could reduce VOC emissions to a maximum of 71.71 pounds per day, which is less than the threshold established by SCAQMD. The requirement for use of low-VOC coatings has been included as Mitigation Measure AQ-1. To meet long-term daily thresholds of NO_X, emissions use be reduced by a minimum of 11.3 percent. Mitigation Measure AQ-2 requires future tenants of the proposed buildings to identify all diesel engine powered trucks within its fleet and verification that NO_X will be reduced by a minimum of 11.3 percent. With implementation of Mitigation Measure AQ-2,

emissions would not exceed SCAQMD thresholds, as demonstrated in Section 4.3 of this report; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation. Impacts to sensitive receptors due to localized carbon monoxide emissions were determined to be less than significant and the proposed project would not subject a substantial number of people to objectionable odors. Therefore, the project will have no contribution to a cumulative increase in air quality impacts in the immediate project vicinity.

Biological Resources. The context for assessing cumulative impacts to local biological resources includes sensitive species and their habitat in the project vicinity. As discussed in Section 4.4, the project site lacks any substantial vegetation. Suitable burrowing owl habitat is on site but no owls were observed. Mitigation Measure BIO-1 has been included to ensure that impacts to potential burrowing owl would remain less than significant. Therefore, the proposed project would not result in cumulative impacts related to the loss of sensitive species in the project area.

Cultural Resources. The context for assessing cumulative impacts to local archeological knowledge of our past is the geographical extent of local historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures C-1 and C-2 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important local archaeological knowledge.

Transportation and Traffic. Cumulative traffic impacts with ambient growth were analyzed in Section 4.13. Twenty-two intersections were analyzed to determine if project traffic would result in any intersection deteriorating to insufficient Level of Service (LOS). Based on the analysis, the proposed project would significantly impact study intersections. Implementation of Mitigation Measure TR-1, which requires fair share payments be made for specified intersection and roadway improvements, impacts would be less than significant. Therefore, the proposed project will have no contribution to cumulative traffic impacts in the project area.

<u>Regional Impacts</u>
Projects can contribute considerably to cumulative impacts in context of the regional environment. Regional cumulative impacts are limited to air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, flooding, land use and planning, mineral resources, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the regional context is summarized below.

The analysis provided in Section 4.11 found that no individual impacts would occur; therefore, the project could not contribute considerably to mineral resources impacts. The analysis provided in Section 4 related to agriculture and forest resources, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to localized cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, biological resources, cultural resources, greenhouse gas emissions, and transportation and traffic were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to

significant regional cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The context for assessing cumulative air quality impacts in the region is the extent to which project-generated emissions will exceed regional air quality standards. As mentioned in Section 4.3, the use of low-VOC coatings during construction activities could reduce VOC emissions to 71.71 pounds per day, which is less than the threshold established by SCAQMD. The requirement for use of low-VOC coatings has been included as Mitigation Measure AQ-1. To meet long-term daily thresholds of NO_X, emissions use be reduced by a minimum of 11.3 percent. Mitigation Measure AQ-2 requires future tenants of the proposed buildings to identify all diesel engine powered trucks within its fleet and verification that NO_X will be reduced by a minimum of 11.3 percent. With implementation of Mitigation Measure AQ-2, emissions would not exceed SCAQMD thresholds, as demonstrated in Section 4.3 of this report; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation. Impacts to sensitive receptors due to localized carbon monoxide emissions were determined to be less than significant and the proposed project would not subject a substantial number of people to objectionable odors. Therefore, the project will have no contribution to a cumulative increase in regional air quality impacts.

Biological Resources. The context for assessing cumulative impacts to regional biological resources includes sensitive species and their habitat in the Inland Empire. As discussed in Section 4.4, the project site lacks any substantial vegetation. Suitable burrowing owl habitat is on site but no owls were observed. Mitigation Measure BIO-1 has been included to ensure that impacts to potential burrowing owl would remain less than significant. Therefore, the proposed project would not result in cumulative impacts related to the loss of sensitive species in the region.

Cultural Resources. The context for assessing cumulative impacts to regional archeological knowledge of our past is the geographical extent of regional historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures C-1 and C-2 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important regional archaeological knowledge.

Transportation and Traffic. Cumulative traffic impacts with ambient growth were analyzed in Section 4.13. Twenty-two intersections were analyzed to determine if project traffic would result in any intersection deteriorating to insufficient Level of Service (LOS). Based on the analysis, the proposed project would significantly impact study intersections. Implementation of Mitigation Measure TR-1, which requires fair share payments be made for specified intersection and roadway improvements, impacts would be less than significant. Therefore, the proposed project will have no contribution to cumulative traffic impacts in the region.

Global Impacts

One topic of global concern is climate change. As discussed in Section 4.7, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Mitigation Measure GHG-1 has been included to reduce energy demand by a minimum of 25 percent. The project will not contribute considerably to global climate change with implementation of existing regulations and Mitigation Measure GHG-1.

Based on the above analysis concerning the local, regional, and global impacts of the project in consideration of past, current, and future projects, the City of Riverside hereby finds that the contribution of the proposed project to cumulative impacts will be less than significant with mitigation incorporation.

c) **Less Than Significant with Mitigation Incorporation.** Based on the analysis of the project's impacts in the responses to items 4.1 thru 4.17, there is no indication that this project could result in substantial adverse effects on human beings. While there would be a variety of temporary adverse effects during construction related to criteria pollutant emissions, these will be reduced to less than significant levels through mitigation and incorporation of standard requirements for air quality protection. Impacts to the local roadway network would be reduced to less than significant levels through payment of fair share fees to provide for intersection and roadway improvements. Less than significant long-term effects would include air quality, population and housing, public services, recreation, and changing the visual character of the site, with a majority of these impacts affecting the project site itself. The analysis herein concludes that direct and indirect environmental effects will at worst require mitigation to reduce to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporation.

5 References

5.1 – List of Preparers

City of Riverside (Lead Agency)
3900 Main Street
Riverside, California 92501
951-826-5371

- Kyle Smith, AICP, Senior Planner
- Gabriel Perez, Principal Planner
- Teri Delcamp, Historic Preservation Senior Planner

MIG | Hogle-Ireland (Environmental Analysis)
1500 Iowa Avenue, Suite 110
Riverside, California 92507
951-787-9222

- Christopher Brown, Director of Environmental Services
- Olivia Chan, Project Associate
- Heidi Mellor, Project Assistant

Natural Resources Assessment, Inc. (Biological Resources)
3415 Valencia Hill Drive
Riverside, California 92507
951-686-1141

- Karen Kirtland

CRM Tech (Cultural Resources)
1016 E. Cooley Drive, Suite A/B
Colton, California 92324
909-824-6400

- Bai "Tom" Tang, Principal Investigator
- Michael Hogan, Principal Investigator
- Deirdre Encarnacion, Archaeologist/Report Writer
- Daniel Ballester, Archaeologist/Field Director
- Terri Jacquemain, Historian

Southern California Geotechnical (Geology and Soils)
22885 Savi Ranch Parkway, Suite E
Yorba Linda, California 92887
714-685-1115

- Daniel W. Nielsen, RCE 77915, Project Engineer
- John A. Seminara, CEG 2125, Principal Geologist

CHJ Environmental, Inc. (Hazards and Hazardous Materials)
1355 E. Cooley Drive, Suite F

Colton, California 92324
714-824-7296

- Gerald J. Grimes, Engineering Geologist

Thienes Engineering (Hydrology and Water Quality)
14349 Firestone Boulevard
La Mirada, California 90638
714-521-4811

- Reinhard Stenzel, R.C.E. 56155
- Brian Weil
- Eduardo Toledanes

Kunzman Associates, Inc. (Transportation and Traffic)
1111 Town & Country Road, Suite 34
Orange, California 92868
714-973-8383

- Robert Kunzman
- Carl Ballard, LEED GA
- William Kunzman, P.E., Principal

5.2 – Persons and Organizations Consulted

City of Riverside, Public Works Department

- Robert Van Zanten, P.E., Principal Engineer
- Toni Redman, Senior Engineering Aide

Mitigation Measure AVQ-1
Prior to issuance of building permits, project site plans shall incorporate the use of low sodium fixtures or similar building lights to minimize glare.

Mitigation Measure AQ-1
Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Community Development Director, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the requirements of the CRP. The CRP measures shall be implemented to the satisfaction of the Building and Safety Division. These shall include the following:

Building A
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 100 g/l for exterior applications.

Building B
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 125 g/l for exterior applications.

Building C
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 50 g/l for interior applications.
- The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 150 g/l for exterior applications.

This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the SCAQMD. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.

Mitigation Measure AQ-2
Prior to issuance of occupancy permits or business licenses, future tenants of the proposed project shall submit a report to the Community Development Director identifying all diesel engine powered trucks within the occupant's fleet and verification that oxides of nitrogen emissions will be reduced by a minimum of 11.3 percent below typical operating conditions. Emissions may be reduced through installation of oxide of nitrogen filters as verified by the California Air Resources Board through executive order, limiting of truck engine years to 1990 or newer, limiting operational truck trips and/or trip length, or any combination of methods that will otherwise not cause the South Coast Air Quality Management District (SCAQMD) daily threshold for oxides of nitrogen to be exceeded. This report shall be updated upon occupancy by a new tenant.

Mitigation Measure BIO-1
A focused survey for burrowing owl shall be conducted 30 days prior to any project construction-related ground disturbance. The survey should be conducted according to the

recommended guidelines of The Burrowing Owl Consortium (1993) as adopted under the WRCMSHCP. If animals are present, the following shall be required:

- As compensation for the direct loss of burrowing owl nesting and foraging habitat, the project proponent shall mitigate by acquiring and permanently protecting known burrowing owl nesting and foraging habitat at the following ratios (per The Burrowing Owl Consortium 1993 and the WRCMSHCP):

    1. Replacement of occupied habitat with occupied habitat at 1.5 times 6.5 acres per pair or single bird;

    2. Replacement of occupied habitat with habitat contiguous with occupied habitat at 2 times 6.5 acres per pair or single bird; and/or

    3. Replacement of occupied habitat with suitable unoccupied habitat at 3 times 6.5 acres per pair or single bird.

- All owls associated with occupied burrows, that will be directly impacted (temporarily or permanently) by the project, shall be relocated and the following measures shall be implemented to avoid take of owls:

    1. Occupied burrows shall not be disturbed during the nesting season of February 1 through August 31, unless a qualified biologist can verify through non-invasive methods that either the owls have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent flight.

    2. Owls must be relocated by a qualified biologist from any occupied burrows that will be impacted by project activities. Suitable habitat must be available adjacent to or near the disturbance site or artificial burrows will need to be provided nearby. Once the biologist has confirmed that the owls have left the burrow, burrows should be excavated using hand tools and refilled to prevent reoccupation.

    3. All relocation shall be approved by the California Department of Fish and Wildlife (Department). A qualified biologist shall monitor the relocated owls a minimum of three days per week for a minimum of three weeks. A report summarizing the results of the relocation and monitoring shall be submitted to the Department within 30 days following completion of the relocation and monitoring of the owls.

    4. A Burrowing Owl Mitigation and Monitoring Plan shall be submitted to the Department for review and approval prior to relocation of owls. The Burrowing Owl Mitigation and Monitoring Plan shall describe proposed relocation and monitoring actions. The Plan shall include the number and location of occupied burrow site and details on adjacent or nearby suitable habitat available to owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation of artificial burrows (numbers, location, and type of burrows) shall also be included in the plan. The Plan shall also describe proposed off-site areas that are preserved to compensate for impacts to burrowing owls/occupied burrows at the project site as required under Condition 1.

Mitigation Measure C-1

If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and

to retain a professional archaeologist to examine the materials to determine whether it is a *unique archaeological resource* as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.

Mitigation Measure C-2
If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.

Mitigation Measure GHG-1
Prior to issuance of occupancy permits or business licenses, buildings shall have installed high-efficiency lighting with a minimum reduction in energy demand of 25 percent below typical lighting. Installation of high-efficiency lighting shall be verified by the Building and Safety Division.

Mitigation Measure TR-1
Prior to issuance of building permits, fair share payment shall be made for the following improvements:

- Pay fair share of the installation of a westbound right turn overlap at the intersection of East La Cadena Drive at Columbia Avenue.

- At the intersection of Chicago Avenue/Paige Drive and Columbia Avenue, pay fair share of the following improvements:
    - Construct a northbound right turn lane
    - Construct an additional southbound left turn lane

- Pay fair share of the construction of a westbound right turn lane at the intersection of SR-60/I-215 Freeway northbound ramps and 3rd Street/Blaine Street.

- At the intersection of Iowa Avenue and Palmyrita Avenue, pay fair share of the following improvements:
    - Install a northbound right turn overlap
    - Construct an additional westbound left turn lane
    - Install a westbound right turn overlap

- At the intersection of Iowa Avenue and Spruce Avenue, pay fair share of the following improvements:
    - Construct an additional northbound left turn lane

  - Construct an additional southbound left turn lane
  - Construct an eastbound right turn lane
  - Construct a westbound right turn lane
  - Construct a westbound right turn overlap

- At the intersection of Iowa Avenue at Blaine Street, pay fair share of the following improvements:
  - Construct an additional northbound left turn lane
  - Install a southbound right turn overlap

- At the intersection of Michigan Avenue at Palmyrita Avenue, pay fair share of the following improvements:
  - Stripe northbound left turn lane
  - Stripe southbound left turn lane
  - Install a traffic signal

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COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
Aesthetics Mitigation Measure							
AVQ-1	Prior to issuance of building permits, project site plans shall incorporate the use of low sodium fixtures or similar building lights to minimize glare.	Prior to Issuance of Building Permits	Incorporation of low sodium fixtures of similar on site plans	Community Development Department			
Air Quality Mitigation Measures							
AQ-1	Prior to issuance of building permits, the project proponent shall submit, to the satisfaction of the Community Development Director, a Coating Restriction Plan (CRP), consistent with South Coast Air Quality Management District (SCAQMD) guidelines and a letter agreeing to include in any construction contracts and/or subcontracts a requirement that the contractors adhere to the requirements of the CRP. The CRP measures shall be implemented to the satisfaction of the Building and Safety Division. These shall include the following: *Building A* • The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications. • The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 100 g/l for exterior applications. *Building B* • The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed zero for interior applications. • The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 125 g/l for exterior applications. *Building C* • The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 50 g/l for interior applications. The volatile organic compounds (VOC) of proposed architectural coatings shall not exceed 150 g/l for exterior applications.	Prior to Issuance of Building Permits	Submittal of a Coating Restriction Plan	Community Development Department			

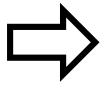
COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	This measure shall conform to the performance standard that emissions of volatile organic compounds from application of interior or exterior coatings shall not exceed the daily emissions thresholds established by the SCAQMD. The CRP shall specify use of High-Volume, Low Pressure (HVLP) spray guns for application of coatings.						
AQ-2	Prior to issuance of occupancy permits or business licenses, future tenants of the proposed project shall submit a report to the Community Development Director identifying all diesel engine powered trucks within the occupant's fleet and verification that oxides of nitrogen emissions will be reduced by a minimum of 11.3 percent below typical operating conditions. Emissions may be reduced through installation of oxide of nitrogen filters as verified by the California Air Resources Board through executive order, limiting of truck engine years to 1990 or newer, limiting operational truck trips and/or trip length, or any combination of methods that will otherwise not cause the South Coast Air Quality Management District (SCAQMD) daily threshold for oxides of nitrogen to be exceeded. This report shall be updated upon occupancy by a new tenant.	Prior to Issuance of Occupancy Permits or Business Licenses	Submit report verifying that oxides of nitrogen emissions will be reduced by 11.3 percent below typical operating emissions.	Community Development Department			
Biological Resources Mitigation Measure							
BIO-1	A focused survey for burrowing owl shall be conducted 30 days prior to any project construction-related ground disturbance. The survey should be conducted according to the recommended guidelines of The Burrowing Owl Consortium (1993) as adopted under the WRCMSHCP. If animals are present, the following shall be required: • As compensation for the direct loss of burrowing owl nesting and foraging habitat, the project proponent shall mitigate by acquiring and permanently protecting known burrowing own nesting and forafing habitat at the following ratios (per The Burrowing Owl Consortium 1993 and the WRCMSHCP): 1. Replacement of occupied habitat with occupied habitat at 1.5 times 6.5 acres per pair or single bird; 2. Replacement of occupied habitat with habitat	30 Days prior to Construction-Related Ground Disturbance	Submit focused survey for burrowing owl	Community Development Department			

COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures	**Monitoring Timing/ Frequency**	**Action Indicating Compliance**	**Monitoring Agency**	**Verification of Compliance**		
				Initials	**Date**	**Remarks**
contiguous with occupied habitat at 2 times 6.5 acres per pair or single bird; and/or 3. Replacement of occupied habitat with suitable unoccupied habitat at 3 times 6.5 acres per pair or single bird. • All owls associated with occupied burrows, that will be directly impacted (temporarily or permanently) by the project, shall be relocated and the following measures shall be implemented to avoid take of owls: 1. Occupied burrows shall not be disturbed during the nesting season of February 1 through August 31, unless a qualified biologist can verify through non-invasive methods that either the owls have not begun egg laying and incubation or that juveniles from the occupied burrows are foraging independently and are capable of independent flight. 2. Owls must be relocated by a qualified biologist from any occupied burrows that will be impacted by project activities. Suitable habitat must be available adjacent to or near the disturbance site or artificial burrows will need to be provided nearby. Once the biologist has confirmed that the owls have left the burrow, burrows should be excavated using hand tools and refilled to prevent reoccupation. 3. All relocation shall be approved by the California Department of Fish and Wildlife (Department). A qualified biologist shall monitor the relocated owls a minimum of three days per week for a minimum of three weeks. A report summarizing the results of the relocation and monitoring shall be submitted to the Department within 30 days following completion of the relocation and monitoring of the owls. 4. A Burrowing Owl Mitigation and Monitoring Plan shall be submitted to the Department for review and approval prior to relocation of owls. The Burrowing Owl Mitigation and Monitoring Plan shall describe proposed relocation and monitoring actions. The Plan shall include the number and location of occupied burrow site and details on adjacent or nearby suitable habitat available to						

COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	owls for relocation. If no suitable habitat is available nearby for relocation, details regarding the creation of artificial burrows (numbers, location, and type of burrows) shall also be included in the plan. The Plan shall also describe proposed off-site areas that are preserved to compensate for impacts to burrowing owls/occupied burrows at the project site as required under Condition 1.						
Cultural Resources Mitigation Measures							
C-1	If potential archaeological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find and to retain a professional archaeologist to examine the materials to determine whether it is a unique archaeological resource as defined in Section 21083.2(g) of the State CEQA Statutes. If this determination is positive, the resource shall be left in place, if determined feasible by the project archaeologist. Otherwise, the scientifically consequential information shall be fully recovered by the archaeologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the City Community Development Director. A tribal monitor shall be retained to oversee earthmoving activities and assist in the identification of potential archaeological resources. The applicant shall bear the cost of implementing this mitigation.	During Grading or Earth Moving Activities	Halt work and retain a professional archaeologist	Community Development Department			
C-2	If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been	During Grading or Earth Moving Activities	Halt work and retain a professional paleontologist	Community Development Department			

COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		**Monitoring Timing/ Frequency**	**Action Indicating Compliance**	**Monitoring Agency**	**Verification of Compliance**		
					Initials	**Date**	**Remarks**
	completed and a report concerning it filed with the Director of Community Development. The applicant shall bear the cost of implementing this mitigation.						
Greenhouse Gas Emissions Mitigation Measure							
GHG-1	Prior to issuance of occupancy permits or business licenses, buildings shall have installed high-efficiency lighting with a minimum reduction in energy demand of 25 percent below typical lighting. Installation of high-efficiency lighting shall be verified by the Building and Safety Division.	Prior to Issuance of Occupancy Permits or Business Licenses	Install high-efficiency lighting	Building Division			
Transportation and Traffic Mitigation Measure							
TR-1	Prior to the issuance of building permits, fair share payment shall be made for the following improvements: • Pay fair share of the installation of a westbound rught turn overlap at the intersection of East La Cadena Drive at Columbia Avenue. • At the intersection of Chicago Avenue/Paige Drive and Columbia Avenue, pay fair share of the following improvements: – Construct a northbound right turn lane – Construct an additional southbound left turn lane • Pay fair share of the construction of a westbound right turn lane at the intersection of SR-60/I-215 Freeway northbound ramps and 3rd Street/Blaine Street. • At the intersection of Iowa Avenue and Palmyrita Avenue, pay fair share of the following improvements: – Install a northbound right turn overlap – Construct an additional westbound left turn lane – Install a westbound right turn overlap • At the intersection of Iowa Avenue and Spruce Avenue, pay fair share of the following improvements: – Construct an additional northbound left turn lane – Construct an additional southbound left turn lane – Construct an eastbound right turn lane – Construct a westbound right turn lane	Prior to Issuance of Building Permits	Pay fair share of improvements	Public Works Department			

COLUMBIA BUSINESS CENTER Mitigated Negative Declaration: Mitigation Monitoring Reporting Program							
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
					Initials	Date	Remarks
	– Construct a westbound right turn overlap • At the intersection of Iowa Avenue at Blaine Street, pay fair share of the following improvements: – Construct an additional northbound left turn lane – Install a southbound right turn overlap • At the intersection of Michigan Avenue at Palmyrita Avenue, pay fair share of the following improvements: – Stripe northbound left turn lane – Stripe southbound left turn lane – Install a traffic signal						



7 Appendix Materials